

EXHIBIT 43 to Declaration of Joel Israel

Case Summary



| Money laundering disclosure | | | | CIFAS | NCIS | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--------------------|---------------------|--|----------------------------|--------------------|---------------|----------------------------------|--------------------|--|-----------|--|--------------------------------|---|---------------------|---------------------|-------------------|-------------------|-----------|------------|-------------------------|-------------------|-----------|-------------|--|--|--|---------|--------|-------------|--------|------|--------|------|--|---------|--------|-------------|--|---------|--------|-------------|--------|------|--|---------|--------|-------------|--|---------|--------|-------------|--|----------|---------|-------------|----------------|--|
| Case Summary | Record Data | Subject Data | Notes & Conclusion | Key Corresp | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Incident Data <table style="width: 100%;"> <tr> <td style="width: 30%;">Control Authority</td> <td style="width: 20%;">Payment Operations</td> <td style="width: 10%;">Status</td> <td style="width: 40%;">Open Source: [GK2:666814]</td> </tr> <tr> <td>Review Date</td> <td></td> <td>by</td> <td></td> </tr> <tr> <td>Remote Delivery Channel</td> <td>N</td> <td>High Profile</td> <td>Y 17 Jun 2002 00:00</td> </tr> <tr> <td>Created on</td> <td>17 Jun 2002 00:00</td> <td>by</td> <td>RBS_Mcomcl</td> </tr> <tr> <td>Last Modified on</td> <td>17 Sep 2003 00:00</td> <td>by</td> <td>RBS_Ohearaa</td> </tr> </table> | | | | Control Authority | Payment Operations | Status | Open Source: [GK2:666814] | Review Date | | by | | Remote Delivery Channel | N | High Profile | Y 17 Jun 2002 00:00 | Created on | 17 Jun 2002 00:00 | by | RBS_Mcomcl | Last Modified on | 17 Sep 2003 00:00 | by | RBS_Ohearaa | Linked Cases <table style="width: 100%;"> <tr> <td style="width: 20%;"></td> <td style="width: 80%;">Address</td> </tr> <tr> <td>276995</td> <td>auto-linked</td> </tr> <tr> <td>617044</td> <td>NONE</td> </tr> <tr> <td>666593</td> <td>NONE</td> </tr> <tr> <td></td> <td>Account</td> </tr> <tr> <td>704079</td> <td>auto-linked</td> </tr> <tr> <td></td> <td>Address</td> </tr> <tr> <td>708047</td> <td>auto-linked</td> </tr> <tr> <td>710368</td> <td>NONE</td> </tr> <tr> <td></td> <td>Address</td> </tr> <tr> <td>753294</td> <td>auto-linked</td> </tr> <tr> <td></td> <td>Address</td> </tr> <tr> <td>772682</td> <td>auto-linked</td> </tr> <tr> <td></td> <td>Personal</td> </tr> <tr> <td>1748664</td> <td>auto-linked</td> </tr> <tr> <td colspan="2" style="text-align: center;">Maintain Links</td> </tr> </table> | | | Address | 276995 | auto-linked | 617044 | NONE | 666593 | NONE | | Account | 704079 | auto-linked | | Address | 708047 | auto-linked | 710368 | NONE | | Address | 753294 | auto-linked | | Address | 772682 | auto-linked | | Personal | 1748664 | auto-linked | Maintain Links | |
| Control Authority | Payment Operations | Status | Open Source: [GK2:666814] | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Review Date | | by | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Remote Delivery Channel | N | High Profile | Y 17 Jun 2002 00:00 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Created on | 17 Jun 2002 00:00 | by | RBS_Mcomcl | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Last Modified on | 17 Sep 2003 00:00 | by | RBS_Ohearaa | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 276995 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 617044 | NONE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 666593 | NONE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Account | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 704079 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 708047 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 710368 | NONE | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 753294 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Address | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 772682 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Personal | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 1748664 | auto-linked | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Maintain Links | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Queries | Refer To | Tel No. | Business | Unable to contact ? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | NONE | Yes | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Money laundering disclosure Record | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Branch | | | Submitted By | N Morrison | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Unit Sortcode | | | Contact No | 7-8067-6849 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Department | | | Legislation | POTA | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated Laundering Total | | | <div style="background-color: black; width: 50px; height: 20px; display: inline-block;"></div> <Unknown> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Reason(s) for Suspicion | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| High non cash turnover | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Transactions GBP 0.00 Add | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Date | Type | Amount | Currency | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | Edit | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Set All Risk Ratings to the the same value of:- | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Amber Blue Green Indigo Red | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Personal Data Add | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Surname | Forenames | Date Of Birth | Sex | Key Information | Risk | Adj | |
|---------|---------------|---------------|-----|-----------------|------|-----|------|
| HEWITT | IBRAHIM BRIAN | | M | NONE | Red | Red | Edit |
| MUSTAFA | E | 17 Nov 1955 | M | NONE | Red | Red | Edit |
| QUNDIL | J | | M | NONE | Red | Red | Edit |
| SADOON | HAMEED THABIT | | M | NONE | Red | Red | Edit |
| SAFIEE | HABIBAH | | M | NONE | Red | Red | Edit |

| Business Data | | | | | | | Add |
|--|------------------|--------------------|-----------------|------|-----|------|-----|
| Business/Org Name | Company Ref. No. | Legal Jurisdiction | Key Information | Risk | Adj | | |
| PALESTINIANS RELIEF & DEVELOPMENT FUND | | UNITED KINGDOM | NONE | Red | Red | Edit | |

| Telephone Data | | | | | | | Add |
|----------------|--|--|--|--|--|--|-----|
| -None- | | | | | | | |

| Address Data | | | | | | | Add |
|-----------------|--------------|--------|-----------|------|-----|------|-----|
| Bldg No. & Name | Street | Town | Postcode | Risk | Adj | | |
| CLARK CRT | STILTON CRES | LONDON | NW10 8DJ | Red | Red | Edit | |
| PO BOX 333 | LONDON | | UNDEFINED | Red | Red | Edit | |

| Account Data | | | | | | | Add |
|--|-----------------|----------|------------------|-----------|-------|-------|------|
| Account Name | Account No. | Sortcode | Account Type | Currency | Risk | Adj | |
| PALESTINIANS RELIEF & DEVELOPMENT FUND | 140-00-04156838 | 60-08-22 | Currency Account | US Dollar | Green | Green | Edit |

| Miscellaneous Data | | | | | | | Add |
|--------------------|--|--|--|--|--|--|-----|
| -None- | | | | | | | |

| Case Notes | | | | | | | Add |
|------------------------|-------------|----------|--|--|--|------|-----|
| Type | Date | User | Text | | | | |
| Case notes | 17 Sep 2003 | Migrated | see case 617044 JC has disclosed on all accounts in a defens | | | View | |
| Summary and Assessment | 17 Sep 2003 | Migrated | Further to our disclosure NI 142909, a large international p | | | View | |
| Conclusion | 17 Sep 2003 | Migrated | On the basis of the information available to us at the prese | | | View | |

| Key Correspondence | | | | | | |
|-----------------------|------------|------|-------------|------|--|------|
| Upload Doc Title | Author | User | Date | | | Add |
| letter to RM | RBS\Mcomcl | GK2 | 09 Jul 2002 | View | | Edit |
| memo from RM | RBS\Mcomcl | GK2 | 10 Sep 2002 | View | | Edit |
| chaser to RM | RBS\Mcomcl | GK2 | 01 Aug 2002 | View | | Edit |
| explanation from cust | RBS\Mcomcl | GK2 | 10 Sep 2002 | View | | Edit |
| expl from cust | RBS\Mcomcl | GK2 | 10 Sep 2002 | View | | Edit |
| expl from cust | RBS\Mcomcl | GK2 | 10 Sep 2002 | View | | Edit |

| | | | | |
|-----------------------------------|-----------------|---------------|-------------------|------|
| expl from cust | RBS\Mcomcl GK2 | 10 Sep 2002 | View | Edit |
| SUSPICION REPORT | RBS\Allenbc GK2 | 12 Jul 2002 | View | Edit |
| SUSPICION REPORT | RBS\Allenbc GK2 | 12 Jul 2002 | View | Edit |
| NCIS Disclosures | | | | |
| | | Author | Date | |
| <u>NCIS Disclosure 207993 (R)</u> | RBS\Mcomcl | 17 Jun 2002 | Amend NCIS Number | |
| No CIFAS Reports | | | | |

1. User: Migrated

On: 17 Sep 2003 00:00

Print Copy

Note: see case 617044 JC has disclosed on all accounts in a defensive disclosure Oct 2001. Have ordered ledgers on sterling accounts and transactions are of the same vein so will not add value to disclosure to include them again. 4/7/02 - Disclosure confirmed. I can't see from the previous case what action, if any, we requested the RM to undertake. Given the background we should be seeking a detailed report from the RM on his knowledge of these customers. Place on spreadsheet and ensure we receive a response - I will need to comment on the High profile report. DH 5/8/02 - NCIS acknowledgement recd, ref 207993. passed to Special Branch 6.8.02 spoke to Terry they have received a six page document regarding the [REDACTED] pay, it should be received at this office within next week. CLM10/9 - Paperwork received advising that the US dollar payment represented a donation from an aid agency in [REDACTED] - they are a regular donor. Monies said to be for health, medical, and education projects. Looking at the US dollar account there are a number of subsequent payments to hospitals, for example, which would tend to substantiate the comments. Copies of the relevant paperwork have been scanned to the case. DH17/9/03 - When completing a further disclosure on this connection - see Goalkeeper Ref 710368 - a review of all linked disclosures was undertaken. The USD payment of [REDACTED] originated from the [REDACTED]. This organisation, albeit not at the time in June 2002, now appears on a list of named/suspected terrorists. GRM 29-05-03. I have spoken to Mark Ashtown (0207 230 3302) at NTFIU Special Branch and confirmed the [REDACTED]

TOH

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]


[REDACTED]

[REDACTED]

[REDACTED]

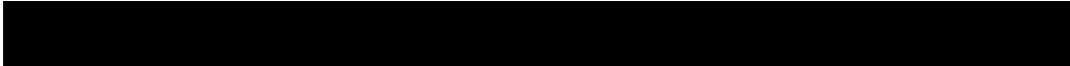
Summary and Assessment History for Case 666814

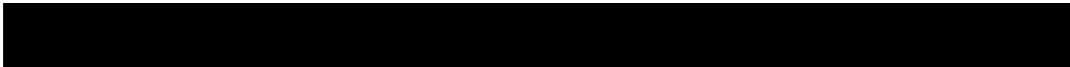
Page 1 of 1

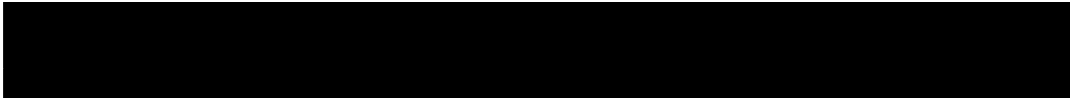
| | | | | |
|--------------------------|--|-------|------|--------|
| 1. User: Migrated | On: 17 Sep 2003 00:00 | Print | Copy | Delete |
| Note: |  | | | |



























1. User: Migrated

On: 17 Sep 2003 00:00

Print

Copy

Update

Note: On the basis of the information available to us at the present time, it is considered that the above incident / activity may constitute or involve money laundering and consequently a disclosure has been made to the National Criminal Intelligence Service or other appropriate authorities. Please see attached documents for further information concerning the financial disclosure. This information may be of relevance when considering any business approaches or dealings with the above named parties.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Memorandum



To: Belinda Lane

Branch/ North East Thames CBC
Unit: 01-81-68

From: C McComas

Date: 09.07.02

Group Investigations & Fraud

Ground Floor
Regents House
PO Box 348
42 Islington High Street
London N1 8XL

Telephone: 020 7615 7246
Switchboard: 020 7833 2121
Facsimile: 020 7615 7287

Re: Money Laundering Suspicion

Account: Palestinians Relief & Development Fund 60-08-22

Group Fraud Ref: 666814

We refer to your/the attached report and advise the following:

- ☒ The decision has been taken to report the matter to the Authorities. The matter must be treated in the strictest confidence and under no circumstances should the account holder be advised of this action.
- ☐ Please update 'Know Your Customer' details and obtain an explanation for the transactions. Should you remain suspicious following your interview with the customer please revert to GI&F with a full explanation of your concerns.
- ☐ Please ensure you review the Bank's 'Know Your Customer' and Due Diligence in respect of this connection. You may wish to consider exiting the relationship unless you are entirely happy with your findings.
- ☐ We consider this connection presents a serious risk to the Group, accordingly it is our view that you should exit the relationship at the earliest opportunity. You may wish to use the attached wording.
- ☐ Please monitor the activity on this account and revert to Group Investigations & Fraud if the activity alters significantly giving further cause for concern.
- ☒ You may continue to operate the account within normal banking practice unless you hear from us to the contrary. Please forward a detailed report on your knowledge of this customer and the activities seen on the accounts.

Please note it is an offence to advise the customer or any other 3rd party of your report to us, that a report has been made to the authorities, or of any subsequent investigation.

Thank you for your assistance

Signed:



Your ref:
Our ref:

Ms C McComas
Fraud Officer
Group Investigations & Fraud
Regents House
42 Islington High Street
London
N1 8XL

9 August 2002

Commercial Banking
Greater London East,
Commercial Banking Centre
PO Box 2401, 1st Floor
10 South Street
Romford
Essex RM1 1BQ
E-mail: Belinda.Lane@rbs.co.uk

Telephone: 01708 774534
Facsimile: 01708 793816

Dear Charlotte

Group Fraud Ref 666814 - Palestinian Relief & Development Fund

Further to your letter dated 1 August I have obtained the following information regarding the inland payment for [REDACTED] received on [REDACTED]

1. The payment was a donation
2. [REDACTED]
3. The payment originated from [REDACTED]
4. The party is a regular donor

I have enclosed further information from our customers in this respect.

Yours sincerely

Belinda Lane
Commercial Manager

National Westminster Bank Plc ("the Bank") is a member of the NatWest and Guinness Moneys Group. The only packaged products, life policies, unit trusts and other collective investment schemes and shareholder and other persons) the Bank advises on and sells are those of the NatWest Group, whose members are regulated by the Financial Services Authority. NatWest Stockbrokers Limited is also a Member of the London Stock Exchange.

National Westminster Bank Plc. Registered in England No 928077. Registered Office: 125 Abchurch Lane, London EC4A 3DF.

Agency agreements exist between members of The Royal Bank of Scotland Group.



Your Ref:

Our Ref: 666814

Date: 01.08.02

Group Investigations & Fraud

Regent's House
42 Islington High Street
London N1 8XL

Telephone: 020 7615
Switchboard: 020 7615 7267
ITS 770
Facsimile: 020 7615 7283

Belinda Lane
Greater London East Corporate Banking Centre
PO BOX 2401
1st Floor
10 South Street
ROMFORD

RE PALESTINIAN RELIEF & DEVELOPMENT FUND

GROUP FRAUD REF 666814

Belinda

Thank you for forwarding a copy of your findings regarding the above customer.

As you are aware City IBC instigated the suspicion report as a result of the large inland payment for [REDACTED]. As this is significantly in excess of other payments we will require further information regarding the transaction.

Please identify the following;

- 1 Was the payment a donation?
- 2 Who was the remitter?
- 3 Where did the payment originate?
- 4 Is this party a regular donator?

I understand you are on annual leave at this time, however would appreciate a reply in writing as a matter of urgency on your return. Thank you for your continued assistance in this matter.

Regards Charlotte McComas
Fraud Officer

13:36

BT

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P. 1



INTERPAL

الصندوق الفلسطيني للإغاثة والتنمية
HELPING PALESTINIANS IN NEED

BELINDA LANE
NATWEST PLC.
ROMFORD
RM1 1HH
FAX NO: 01708-773 816

H.O. Box 3333
LONDON
NW6 1RW
Tel: 020 8450 8802
Fax: 020 8450 8204
Email: info@interpal.org
Website: www.interpal.org

Our Ref: (7805)
Date: 6 August 2002

Dear Belinda,

Transfer from Abroad: Your Query

Further to your query and our telecon yesterday, please find attached correspondence relating to the transfer that is the subject of your query.

I confirm that the transfer of [REDACTED] is a donation from a [REDACTED] in called [REDACTED] Mosque) for charitable and humanitarian projects as detailed in the translation of the correspondence attached. In brief, the funds are for health and medical and education projects.

Please find attached 6 pages of our letter of acknowledgement and receipt to them, and a copy of the transfer document that they forwarded to us. All the documents are accompanied by translations.

I trust this is what you require. Please do not hesitate to contact me should you need further information.

Yours sincerely,

Mr. E. Mustafa
Vice-Chair of the Board of Trustees

Registered Charity No. 1040094

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

13:36

AT

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P. 4

Brief Translation of document no 1
Interpal's acknowledging letter to ...

The Islamic charitable society for the support of Al-Aqsa Al-Shareef (the holy Aqsa mosque).

The Republic of Yemen.

Subject: receiving the sum of (\$

We have received from you the sum of () one hundred and eighty one thousand dollar and that is for the following projects:

1. in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
2. in support of the family educational centre in the west bank and Gaza.
3. support for the summer centres in the west bank and Gaza.
4. support for the school kit project in the west bank and Gaza.

Please find enclosed a receipt no: (16-02)

Our brothers and sisters we do appreciate the effort you make in helping your brothers and sisters in Palestine. We would also like to assure you that each penny goes toward helping them.

13:36

AT

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P. 6

Brief Translation of document no 2
Interpal's acknowledging letter to ...

Receipt no: 16-02
Dated : 05/06/02

We acknowledge the transfer made by [REDACTED]
[REDACTED] The
Republic of Yemen.

The amount of : [REDACTED]
Method of payment: bank transfer
Projects implementations:

In supports for hospitals and medical centres and orphanage homes in the
west bank and Gaza.

In support of the family educational centre in the west bank and Gaza.

In Support for the summer centres in the west bank and Gaza.

In Support for the school kit project in the west bank and Gaza.

Received by: the Palestinian Relief and Development Fund.

13:37

AT

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P.8

Brief Translation of document no 3
Interpal's acknowledging letter sent by [REDACTED]
[REDACTED] (the noty Aqsa mosque). The
Republic of Yemen

5. [REDACTED] in supports for hospitals and medical centres and orphanage homes in the west bank and Gaza.
6. [REDACTED] in support of the family educational centre in the west bank and Gaza.
7. [REDACTED] support for the summer centres in the west bank and Gaza.
8. [REDACTED] support for the school kit project in the west bank and Gaza.

- a) Required one letter of acknowledgment for the whole amount and the exact amount of money as above and a receipt.
- b) Reports from all benefited documented with photographs project implementation and preferably accompanied with videos, letter of thanks from all of them.

Official
stamp

Dated :02/06/02

The English writing is the bank payment copy showing all the details.

IBC 666814 HP
617044

The Royal Bank of Scotland

Corporate Banking Money Laundering Suspicion Report Form

| | | | |
|---|---------------------------------------|---|---------------------------------------|
| Surname/Business name <i>Palestinian Development Fund - Interhal</i> | | Forenames | |
| Male/Female | Nationality (if known) | Date of Birth | |
| Address (include postcode) <i>P.O. Box 3333 Jordan NW 6-12W</i> | | Additional/Previous Addresses: <i>Regent Flat 60 Black Court Stilton Crescent London NW10-825</i> | |
| Telephone No: | | Companies - Date of Country of Incorporation/registered No: | |
| No & Country of issue of Passport or other ID document seen/source of introduction/reference taken: | | | |
| Account No(s) 1. <i>95142940</i> 2. <i>95142975</i> 3. <i>95142983</i> 4. <i>95005712</i> | Account Type <i>17/0/041 56838</i> | Date Opened <i>550/0/08504882</i> | |
| Date when Relationship with Bank started: <i>4/10/1994</i> | | | |
| Stated Occupation: <i>ad. Mem.</i> | | | |
| Name & Address of Employer: | | | |
| Additional/Associated Names: | Date of Birth: | In Account | Address, esp P/Codes/Passport No etc. |
| Date: | Amount | De/Cr: | Source/Reason for Suspicion |
| | | | |
| <p>Indicators for Suspicion</p> <p>Officials Name - <i>E. Mustafa, Ibrahim B. Hani, & Jundal, Mahfouz Safie</i></p> <p><i>Direct access customer to IBC S.E. & City</i></p> <p><i>When contacted to advise of receipt of money Mr Jundal (see above) commented the funds had been expected from [redacted]</i></p> <p><i>Connection between [redacted], at Jundal and present Middle East.</i></p> | | | |



Corporate Banking Money Laundering Suspicion Report Form

Continued / In note of [redacted] notes that a cheque was accepted with payee as [redacted] (= Holy War)

Security & safe Custody held (brief details only)

Boxes & Parcels held

Special Signing Instructions, e.g. Third party mandates

If a company/partnership etc attach a copy of mandate
Other accounts known to be held (including Building Societies)

Status Enquiries Received

Nature of Suspected Offence

Possible umbrella - for funding terrorism in middle east

Drug Trafficking
Terrorism ☒
Other crime

Branch / Depart Ref:

INLAND Payment
IBC CITY

Name of Contact:

N. MORRISON

Tel/ITS

Ext.

7- 8067 -6849

Signed:

N. Morrison

Senior Officer/Manager

Date

7/6/2002

NCIS Disclosure for Case 666814 (Received)

Close

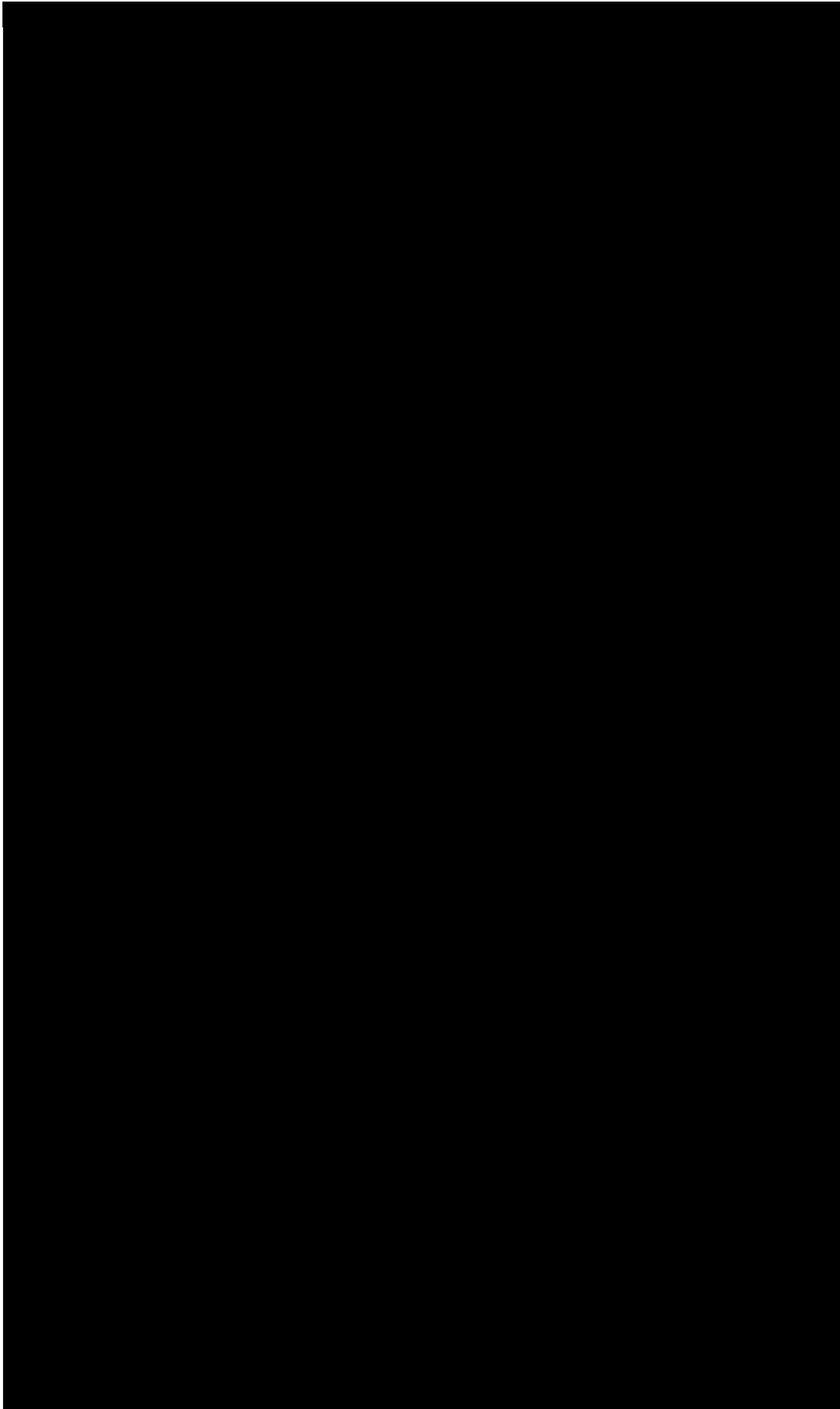
Print

**Core NCIS details created on 17 Jun 2002 by RBS\Mcomcl
RBS\Hartida on 04-JUL-02]**

[Submitted by

| | | | |
|---------------------|---------------|---------------------------|----------|
| Disclosure Type | Terrorism | Submitting Branch Address | Natwest |
| Disclosure Date | 17 Jun 2002 | | City IBC |
| Branch / Outlet | Finsbury Park | | |
| Branch Code | 60-08-22 | | |
| Trust Indicator | N | | |
| Further Information | Y | | |
| | | Postcode | |

Text



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**EXHIBIT 44 to Declaration of Joel Israel
(Account Statement, 1 page)**

This document has been filed Under Seal

**EXHIBIT 45 to Declaration of Joel Israel
(Bank Transfer, 1 page)**

This document has been filed Under Seal

**EXHIBIT 46 to Declaration of Joel Israel
(Account Statement, 1 Page)**

This document has been filed Under Seal

**EXHIBIT 47 to Declaration of Joel Israel
(Bank Transfer, 2 pages)**

This document has been filed Under Seal

**EXHIBIT 48 to Declaration of Joel Israel
(Account Statement, 1 page)**

This document has been filed Under Seal

**EXHIBIT 49 to Declaration of Joel Israel
(Wire Transfer, 3 pages)**

This document has been filed Under Seal

**EXHIBIT 50 to Declaration of Joel Israel
(Bank Transfer, 1 page)**

This document has been filed Under Seal

EXHIBIT 51 to Declaration of Joel Israel

From: FLEURB on behalf of BAUGH, Fleur, Investigations (NWB)
Sent: Thursday, October 25, 2001 11:10:53 AM
To: GAYLE, Sonia, Grp Comp (NWB)
CC: Swanney, David; TRANTUM, Neil, Investigations (NWB); HILL, Chris, Investigations (NWB); Hoseason, Michael (Group Fraud); Stuart, Jane; Loudon, Murray; BEIGHTON, Jay, Investigations (NWB)
Subject: Bin Laden Connections.

Attachments: Bin Laden Connections.xls

Sonia,

Further to our telephone conversation concerning potential Bin Laden linked individuals and organisations, please find attached the spreadsheet listing details of these potential connections.

- Sheet 1 contains the list of linked individual names &
- Sheet 2 contains the list of linked company/organisation names (the sheet tabs are on the bottom left of the spreadsheet).

You will see that further id details and a brief description of the potential link to Bin Laden have been listed for each name/organisation along with the info source and whether or not the name has been circulated around the Group on one of the lists to date. A number of these names have already been circulated for example on the UN Sanctions list, President Bush list or one of the K notices, and a number of the names have been circulated on the FBI's most wanted terrorist list and by New Scotland Yard Anti Terrorist Squad since this list was compiled.

These details were compiled mainly from information found on the Internet and in various press searches, it is therefore difficult at this point to assess the reliability of the information.

Once you've had a chance to look through the spreadsheet, please give me a call to discuss any action which you consider necessary and the possibility of compiling a separate circulation containing some or all of the names which have not yet been distributed across the Group.

Regards,
Fleur.

Fleur Baugh
Fraud Liaison Desk, GI&F
Regent's House
Tel: 020 7615 7253
Fax: 020 7615 7286
email: fleur.baugh@natwest.com

| Linked Individual Name | ID & Additional details | Association re Osama Bin Laden (OBL) | Source | Circulated to Group | On GK | Spreadsheet Link | Further Association / Link Details |
|------------------------|-------------------------|--------------------------------------|--------|---------------------|-------|------------------|------------------------------------|
|------------------------|-------------------------|--------------------------------------|--------|---------------------|-------|------------------|------------------------------------|

Redacted - Non-Responsive

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214837

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214838

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214839

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214840

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214841

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214842

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214843

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214844

| Linked Company / Organisation | ID details | Association re Osama Bin Laden (OBL) | Source | Circulated to Group | On GK | Spreadsheet Link | Further Association/Link Details |
|-------------------------------|------------|--------------------------------------|--------|---------------------|-------|------------------|----------------------------------|
|-------------------------------|------------|--------------------------------------|--------|---------------------|-------|------------------|----------------------------------|

Redacted - Non-Responsive

| | | | | | | | |
|----------------|-----------------|-------------------------------------|----------|----|----|--------------------------------|---|
| Islamic Relief | Islamic charity | Funds sent from NBC to this account | Internet | no | No | Khalid Bin Mahfouz (KBM) & NCB | Funds sent from [REDACTED] by order of [REDACTED] into this acc |
|----------------|-----------------|-------------------------------------|----------|----|----|--------------------------------|---|

Redacted - Non-Responsive

| | | | | | | | |
|---|---------------------------------|--|---------------------------|----|----|-----|--|
| The International Islamic Relief Organisation | London based human rights group | Linked to terrorist bomb plots in the Philippines & India. Suspected of being used to launder cash for OBL | Internet / Metro 01/10/01 | no | No | NCB | Received money from [REDACTED] under authority of [REDACTED] |
|---|---------------------------------|--|---------------------------|----|----|-----|--|

Redacted - Non-Responsive

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NW 214845

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214846

Redacted - Non-Responsive

HIGHLY CONFIDENTIAL

NW 214847

EXHIBIT 52 to Declaration of Joel Israel

In The Matter Of:

*TZVI WEISS, et al. - NATAN APPLEBAUM, et al v.
NATIONAL WESTMINSTER BANK, PLC.*

*FLEUR BAUGH
Vol. 1
May 20, 2009*

*European Deposition Services
59 Chesson Road
London W14 9QS - UK
Tel +442073850077
www.european-depositions.com*

Original File 5-20-09 fleur baughFINAL.txt
Min-U-Script®

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF NEW YORK
3 -----x
4 TZVI WEISS, et al.,
5
6 Plaintiffs,
7
8 -against- Action No. 05-CV
9 4622 (CPS) (MDG)
10
11 NATIONAL WESTMINSTER BANK, PLS,
12
13 Defendant.
14 -----x
15 NATAN APPLEBAUM, et al.,
16
17 Plaintiffs,
18
19 -against-
20
21 NATIONAL WESTMINSTER BANK, PLC.,
22
23 Defendant.
24 -----x
25

* HIGHLY CONFIDENTIAL *

VIDEOTAPED DEPOSITION of FLEUR BAUGH,
taken before Cheryl Kerr, LSR, Notary Public
and Shorthand Reporter, held at the offices
the offices of Cleary, Gottlieb, Steen &
Hamilton, LLP, located at 55 Basinghall
Street, London, England on Wednesday, the
20th day of May, 2009, at 9:42 a.m.

2

APPEARANCES:

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Philadelphia, Pennsylvania 19107-3304

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BY: JONATHAN I. BLACKMAN, ESQ.
PATRICK SHELTON, ESQ.

OLEN LLC
Attorneys for Plaintiff Tzvi Weiss
700 Kinderkamack Road
Oradell, New Jersey 07649

BY: JOSHUA D. GLATTER, ESQ.

Also Present: Simon Rutson, Videographer

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| Exhibit 2 | Document with Bates No. NW000149 through NW000232 | 73 |
| Exhibit 3 | Document with Bates No. NW000335 and NW000336 | 74 |
| Exhibit 4 | Document with Bates No. NW162188 through NW162193 | 190 |
| Exhibit 5 | Goalkeeper money laundering disclosure record dated 9-27-01 | 204 |
| Exhibit 6 | Document with Bates No. NW008367 to NW00873 | 225 |
| Exhibit 7 | Document with Bates No. NW166235 through NW166251 | 234 |
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THE VIDEOGRAPHER: This is the beginning of Tape 1, Volume 1 in the deposition of Fleur Baugh, taken 20th of May 2009, 9:42 a.m., as indicated on the video screen.

This deposition is being taken in the matter of Tzvi Weiss, et al., Plaintiffs, against National Westminster Bank PLC, Defendants, Civil Action No. 05CV4622, bracket, CPS, close brackets, and brackets, MDG, close brackets, being heard in the Eastern District of New York, the United States District Court. The videographer is Simon Rutson.

The court reporter is Cheryll Kerr, of European Deposition Services. The deposition is taking place at the offices of Cleary, Gottlieb, Hamilton & Steen --

MR. BLACKMAN: Steen & Hamilton.

THE VIDEOGRAPHER: -- Steen & Hamilton -- excuse me, sir -- in London, England.

Would counsel present please introduce themselves?

MR. SCHWARTZ: Stephen Schwartz from

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the law firm of Kohn, Swift & Graf, Philadelphia, Pennsylvania, representing the Weiss plaintiffs.

MR. GLATTER: Joshua Glatter from the law firm of Osen LLC, in Oradell, New Jersey, also on behalf of the Weiss plaintiffs.

MR. BLACKMAN: Jonathan Blackman from Cleary, Gottlieb, Steen & Hamilton.

I represent the lead defendants, National Westminster Bank, and the witness, Fleur Baugh.

THE VIDEOGRAPHER: Will the court reporter swear in the witness?

F L E U R B A U G H,
called as a witness, having been duly sworn or affirmed, was examined and testified as follows:

THE VIDEOGRAPHER: Thank you. You may proceed.

DIRECT EXAMINATION

BY MR. SCHWARTZ:

Q. Ms. Baugh, as I said, my name is Stephen Schwartz. I am a lawyer in Philadelphia, Pennsylvania in the United States. I represent a

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group of people who have sued National Westminster Bank, and I am going to ask you some questions today to find out what you know about certain topics that are part of the factual record in this case, and so we will see what you know.

A. Okay.

Q. This is not an endurance contest. We have no interest in making it difficult or uncomfortable for you.

If you need to take a break at any time, please let us know. Routinely, we will probably take a break about once an hour.

I am going to be asking you a number of questions over the course of the day. If you don't understand something that I ask, please ask me to repeat or rephrase.

If you don't ask me to repeat or rephrase, I am going to assume that you have understood the question.

A. Uh-huh.

Q. From time to time, you may hear your lawyer object to one of my questions. Unless your lawyer tells you not to answer, I'm sure he will advise to you proceed with your answer, despite his objection --

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1 Goalkeeper 1, then actually started to implement
2 Goalkeeper 1 in 1998.
3 Q. Were you one of the developers of the
4 software?
5 A. No, no, no.
6 Q. So who actually developed the software?
7 A. No.
8 It was developed in-house by Financial Markets
9 IT.
10 Q. Financial Markets IT had its own
11 programmers?
12 A. Yes. There was a programmer assigned to
13 us.
14 Q. And who was responsible for the -- the --
15 the substantive approach of Goalkeeper, if you know
16 what I mean?
17 MR. BLACKMAN: Object to the form of
18 the question.
19 MR. SCHWARTZ: How would you like me
20 to ask that?
21 MR. BLACKMAN: It's quite vague,
22 but...
23 BY MR. SCHWARTZ:
24 Q. Do you know what I'm asking? It's one
25 thing you told me about the software.

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1 You told me who did the software. There's also
2 the thinking of how you are going to develop the
3 program to work.
4 So what I'm trying to find out is, who were
5 the -- who put in the banking knowledge?
6 A. So Chris Hill --
7 Q. Uh-huh.
8 A. -- my line manager, who was head of
9 Security and Fraud in Financial Markets, was the
10 project owner for Goalkeeper, so it was his
11 contract.
12 Q. Our understanding is that Goalkeeper 2
13 came to being in around 2000.
14 Is that correct information?
15 MR. BLACKMAN: Object to the form of
16 the question.
17 THE WITNESS: That's correct. Sorry.
18 BY MR. SCHWARTZ:
19 Q. Is it correct that Goalkeeper came into
20 being -- Goalkeeper 2 --
21 (Whereupon, several speakers talk over
22 each other.)
23 BY MR. SCHWARTZ:
24 Q. All right, so let's start over. I will
25 ask the question.

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1 Did Goalkeeper 2 come into being in the year
2 2000?
3 A. It did.
4 Q. Was Goalkeeper 2 under development -- let
5 me ask it this way:
6 Withdrawn.
7 When did you begin to develop Goalkeeper 2?
8 A. It would have been around 1999.
9 Q. Was there a manual for Goalkeeper 1?
10 A. There could have been a manual, so I
11 would have written some instructions for the people
12 using Goalkeeper 1 for those people that we set up
13 around how to search the system, because it was
14 purely a search engine;
15 But in terms of the types of manual that we
16 wrote for Goalkeeper 1 -- for Goalkeeper 1, that
17 didn't exist.
18 Q. You said that Goalkeeper 1 was purely a
19 search engine?
20 Is that correct?
21 A. That's right.
22 Q. So how did the functionality change from
23 Goalkeeper 1 to Goalkeeper 2?
24 A. So Goalkeeper 2 was a case management
25 system as well, so the search engine in Goalkeeper 2

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1 remained the same as Goalkeeper 1;
2 But what we did was develop a case management
3 system to sit behind the search engine to enable
4 people to actually look more in depth at the types
5 of records on the system.
6 MR. GLATTER: Sorry.
7 Could I just ask for the response to
8 be read back?
9 (Thereupon, the record was read back
10 by the reporter.)
11 MR. GLATTER: Thank you.
12 BY MR. SCHWARTZ:
13 Q. Do you know whether there was a
14 predecessor to Goalkeeper 1?
15 A. Could you --
16 Q. Clarify?
17 A. -- be a little clearer?
18 Q. Was there a predecessor software at the
19 bank that performed similar functions to the
20 Goalkeeper system?
21 A. There was a case management system used
22 in Fraud Office, which was called Fox.
23 Q. Fox? Okay. Well, that explains a lot.
24 The word "Fox" showed up in all these
25 documents. Did you have somebody named Fox? Okay.

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1 A. -- so Chris Hill.
2 Christopher Hill -- Christopher Hill was the
3 project owner responsible for delivering the
4 project. Myself, I sat on the committee.
5 Q. Do you know whether Mr. Hill is still
6 employed by the bank?
7 A. He's not, no.
8 Q. Do you know where he is currently
9 employed?
10 A. I do.
11 Q. Where is that?
12 A. For Aviva Insurance.
13 Q. Aviva Insurance?
14 A. (Nodding).
15 THE REPORTER: Yes?
16 THE WITNESS: Yes.
17 BY MR. SCHWARTZ:
18 Q. Is that in London?
19 A. No.
20 Q. Where is it?
21 A. In Norwich.
22 Q. In?
23 A. Norwich.
24 Q. So who beside Chris Hill was on the
25 Project Control Committee?

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1 A. So an individual from Group Compliance
2 department called Charlie Middleton.
3 Q. Yes. Is Mr. Middleton still employed by
4 the bank?
5 A. He is.
6 Q. Anyone else?
7 A. For Corporate Banking, there were a
8 number of representatives, but one of them was
9 Debbie Sears.
10 Q. None of them were?
11 A. One of them was Debbie Sears. Sorry.
12 Q. Could you spell that, please?
13 A. D-E-B-B-I-E. Sears is S-E-A-R-S.
14 Q. S-E-A-R-S? Debbie Sears? Is Ms. Sears
15 still with the bank?
16 A. To the best of my knowledge, she is.
17 Q. And she was a representative of Corporate
18 Banking?
19 A. She was.
20 Q. Anyone else?
21 A. Not -- no -- no more names that spring to
22 mind at the moment, yes.
23 Q. Subsequent to the development of
24 Goalkeeper 2 -- let me ask you first: When did
25 Goalkeeper 3 replace Goalkeeper 2?

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1 A. Goalkeeper 3 became operational at the
2 end of November, 2004.
3 Q. Four?
4 Between the implementation of Goalkeeper 2 in
5 2000, and the switchover to Goalkeeper 3 in November
6 of 2004, were the banking policies implemented into
7 Goalkeeper 2 -- 2 altered at any time?
8 A. Can you clarify?
9 Q. Yes.
10 The Goalkeeper 2 functionality -- correct me if
11 I am incorrect, but it reflects a bank policy of
12 dealing with certain situations, fraud and money
13 laundering? Is that clear?
14 It's -- the bank implemented the system, so it
15 runs the way the bank thinks it ought to, is that
16 correct?
17 A. I --
18 Q. All right. I am going to ask -- okay.
19 What I'm trying to find out is, did the
20 policies and procedures for the way in which
21 Goalkeeper functioned change between the year 2000
22 and 2004?
23 A. I -- so in answer to that question, I
24 don't know whether the policies and procedures
25 changed.

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1 It was implemented in individual divisions on a
2 sort of -- on a divisional basis, so the divisions
3 were actually owned -- the policies and the
4 procedures and the development of the procedures for
5 the use of the database.
6 Q. So could you give me an example of how
7 one particular department you select -- well, let's
8 say Corporate Banking --
9 A. Yeah.
10 Q. -- since we talked about that, how
11 Corporate Banking would implement procedures into
12 the operation of the Goalkeeper 2 system?
13 A. So Corporate Banking would look at which
14 areas that they wanted to implement the database in,
15 which type of clients potentially they would want to
16 screen, and for -- do the precustomer screening
17 checks on, and they would draft the processes for
18 their staff to follow.
19 For example, their standard users doing
20 searches and their complex users in reviewing any
21 results, they would draft those processes and
22 implement with their staff.
23 Q. So what could they change about the way
24 the Goalkeeper system ran?
25 A. They wouldn't change the system itself.

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1 Q. Do you know whether the reports are kept?
2 A. I don't know.
3 Q. Turn to page 160, please.
4 Do you see the acronym "MLDU"? What does that
5 stand for?
6 A. Money Laundering Detection Unit.
7 Q. Detection Unit?
8 Is that different than the Money Laundering
9 Reporting Team?
10 A. It is.
11 Q. Can you describe, please, what is the
12 Money Laundering Detection Unit?
13 A. The Money Laundering Detection Unit was
14 the team who reviewed the search base alerts.
15 Q. Did that MLDU operate continuously
16 between 2000 and 2004?
17 A. I don't know.
18 It was a Royal Bank of Scotland unit, so it
19 operates definitely from integration of the two --
20 of the two banks.
21 Q. Okay. Do you know who was a member of
22 the Money Laundering Detection Unit in the 2000 to
23 2005 period?
24 A. I don't.
25 Actually, they were Edinburgh based, and a

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1 separate function.
2 Q. Can you turn, please, to page 162? This
3 section applies --
4 It talks about the need to get express consent
5 from within NCIS before a transaction can proceed.
6 That's correct, isn't it?
7 A. Yes.
8 Q. Does that only pertain to the time frame
9 subsequent to July of 2002?
10 A. It does.
11 Q. Yes?
12 A. Yes.
13 Q. Right.
14 Do you know why a transaction might be stopped
15 pending NCIS consent?
16 A. I don't.
17 Q. I mean, it says referring to you for
18 consideration as to whether prior consent is
19 necessary.
20 You and Doug Hartley? You are the two people
21 it is referring to?
22 A. On an internal basis.
23 Q. On internal basis?
24 A. Right.
25 Can you maybe just clarify the certain -- the

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1 question?
2 Q. Yes, of course. Well, we're talking
3 about the first July 2002 period.
4 What are the factors you would use to determine
5 or the bank would use to determine whether prior
6 consent was necessary?
7 A. If the business area reported to us a
8 transaction that they were suspicious of and it was
9 in the future, so it hadn't actually taken place
10 yet, potentially we would report it to NCIS and seek
11 their consent to make that transaction in the event
12 that we had concerns that were potentially
13 suspicious.
14 Q. Is that something that the bank did
15 frequently?
16 A. It was not frequent.
17 Q. Not frequent?
18 A. No.
19 Q. You may not know the answer to this, and
20 your lawyer may say that this is outside of the
21 30(b)(6), but do you know whether any Interpal
22 transactions were ever held up pending prior consent
23 by the NCIS?
24 A. I don't know.
25 Q. On page 163, it says "When assessing

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1 whether the bank should seek prior consent to a
2 transaction, the following issues must be
3 considered: The level of suspicion attached to the
4 transaction," which is described as an objective
5 test.
6 How is that determined? How is the level of
7 suspicion determined?
8 A. That would be --
9 I think the suspicion from the member of staff
10 on the suspicion report would -- would form part of
11 that decision, so a member of staff would have
12 reported the transaction into the Money Laundering
13 Reporting Team and sought advice, so we would --
14 There would be -- part of the decision as to
15 the level of suspicion would be based on the nature
16 of this suspicion from the member of staff and the
17 type of activity on the account.
18 Q. So when you say "the member of the
19 staff," you are talking about the Money Laundering
20 Reporting Unit?
21 A. No.
22 The member of staff in the business who has
23 reported the --
24 Q. To the money laundering --
25 A. -- the transaction to the money

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1 laundering team.
2 Q. So the level of suspicion that they
3 articulated in the report that went to the Money
4 Laundering Reporting Unit --
5 A. Yeah, the nature.
6 Q. -- would be a factor to consider when
7 assessing whether prior consent was necessary?
8 A. Absolutely, the nature of the suspicion.
9 Q. Again, the next line the "Intended
10 destination of the funds."
11 In other words, what that's saying is, if the
12 money is being transferred overseas, outside of what
13 it calls UK law enforcement, that would increase the
14 need to seek prior consent?
15 MR. BLACKMAN: Objection to the form
16 of the question.
17 MR. SCHWARTZ: Let me rephrase that.
18 I understand the objection.
19 BY MR. SCHWARTZ:
20 Q. This is --
21 This list is a list of factors to consider
22 (indicating) when assessing whether prior consent is
23 necessary, is that correct?
24 A. It is, yes.
25 Q. So the second one says "The intended
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1 destination of the funds is one of the factors to
2 consider," will they be outside the reach of UK law
3 enforcement?
4 A. It would be one of the factors to take
5 into consideration.
6 Q. So what that means, then, is if the
7 money's being sent out of the country, that
8 increases that that is a reason to seek prior
9 consent, correct?
10 MR. BLACKMAN: Object -- object to
11 the form of the question. These are
12 factors to consider?
13 Come on. I send checks out of the
14 country every day. Do you think the bank
15 reports my checks because they are going
16 out of the country?
17 BY MR. SCHWARTZ:
18 Q. Why don't you answer the question?
19 I am reading out of the NatWest manual. It
20 says "The intended destination of the funds is
21 something to consider," so how is it considered?
22 A. It would be one of the factors to take
23 into consideration as a whole of what's being
24 reported to -- so what type of customer you've got,
25 what type of business they undertake, and what we
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1 know about that business. It's one of many factors.
2 Q. But the way it would be considered is if
3 funds were being sent outside of the reach of UK law
4 enforcement, that increases the reason to seek prior
5 consent, correct?
6 MR. BLACKMAN: Object to the form of
7 the question.
8 You are saying "increases" --
9 MR. SCHWARTZ: All right.
10 Your objection stands, Mr. Blackman.
11 Now please let the witness answer.
12 THE WITNESS: It would depend on the
13 circumstances of the case being reported,
14 and it would be one of the factors.
15 BY MR. SCHWARTZ:
16 Q. And what would it depend on?
17 A. The circumstances being reported to --
18 Q. What circumstances?
19 A. The transaction.
20 Q. What circumstances? What? What would it
21 depend on?
22 A. I'm sorry. I don't understand the -- the
23 question.
24 Q. On page 163, it says "If from a suspicion
25 report or telephone call to this office, you" --
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1 "you" being a member of the Money Laundering
2 Reporting Unit, correct?
3 A. I was a member of the Operations Team,
4 and the Money Laundering Reporting Team sat within
5 that unit.
6 Q. But that's what the "you" refers to
7 there, correct? I didn't mean you personally,
8 Mrs. Baugh. I meant in this line here (indicating).
9 "If from a suspicion report or telephone call
10 from this office," that would be the office of the
11 money laundering unit, correct?
12 A. That would be, yeah, a member of that
13 Operations Team and Money Laundering Reporting Team.
14 Q. Then it says "You identify a
15 transaction."
16 "You" being a member of the Money Laundering
17 Reporting unit, correct?
18 A. Yeah.
19 Q. -- "That you feel generates sufficient
20 concern to warrant a pre-event disclosure,
21 immediately refer it to Fleur Baugh or Doug
22 Hartley."
23 So you personally did these reviews to
24 determine whether consent was necessary, correct?
25 A. I would give guidance to the team.
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1 Q. I'm sorry.
2 If we start this on page 15, that's 247 is the
3 Bates range.
4 A. All right. Yeah.
5 Q. We're still in Exhibit 1.
6 This is now the section of Exhibit 1 that talks
7 about case key space records, correct?
8 A. That is, yes.
9 Q. That is the functionality that's
10 available to complex users, is that right?
11 A. That's right. That's right, yes.
12 Q. Okay. First of all, look at where it
13 says High Profile (indicating).
14 It says "This field indicates where the record
15 is a high profile case, for example, money
16 laundering where estimated amount laundered is
17 250,000 pounds or more." Do you know why that
18 number was chosen?
19 A. I don't know why the 250,000 pounds was
20 chosen.
21 Q. Do you know what it was about a
22 transaction of that size or larger that makes it
23 higher risk?
24 A. That could be a figure of a lot of
25 different transactions that might make up 250,000,

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1 rather than an individual transaction itself.
2 So you might look at account turnover on an
3 account over a period of time rather than that being
4 an individual transaction (indicating).
5 Q. So it may be an aggregated number?
6 A. Yes.
7 Q. But it just seems like to me sort of an
8 arbitrary cutoff. I was just wondering how that
9 number was chosen and ...
10 A. Sorry.
11 I don't know the particular reasoning behind
12 choosing that particular figure, but in certain
13 different case types, there would have been certain
14 thresholds.
15 Q. Yeah.
16 A. So, for example, maybe in a fraud case
17 you might have a loss of 50,000 pounds could trigger
18 a high profile case, that sort of being seen as a
19 significant amount, so ...
20 Q. Okay. On 249, it's talking now about
21 Inputting Data into the Key Space Records, is that
22 correct?
23 A. So this part of the manual (indicating)
24 is talking about the different fields that you would
25 actually see on a case space record.

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1 Q. But it's instructions for inputting, or
2 not?
3 A. I think these first few pages are
4 detailing the actual fields within the database and
5 giving an explanation as to what that field is.
6 Q. Okay, so when we get to the section on
7 risk rating, all individual names, company, business
8 names, addresses, and telephone number data entered
9 into Goalkeeper is allocated a risk rate rating for
10 a summary of each risk rating see that section, but
11 how is the transaction allocated a risk rating?
12 A. So the actual individual name?
13 Q. Yeah.
14 A. Company name?
15 That would be dependent on the particular
16 circumstances of a case, or actually maybe the --
17 the actual case type itself.
18 Q. So is it discretionary on the part of the
19 data inputter?
20 A. It is.
21 It's discretionary for the inputter of the
22 case, but also there were general guidelines, or
23 guidance actually given to people during the
24 training, around what would constitute a particular
25 risk rating, and the circumstances in --

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1 (Thereupon, an informal discussion was
2 held off the record.)
3 THE WITNESS: "The circumstances you
4 might use at a particular risk rating."
5 BY MR. SCHWARTZ:
6 Q. Do you know where that is located in
7 the --
8 A. That was --
9 That was actually sort of one-on-one training
10 provided to people rather than being set down in the
11 manual (indicating).
12 Q. Is there a training manual of some kind
13 that would have that information in it?
14 A. No.
15 I think it was actually more as -- as the sort
16 of processes and the system was used, just giving
17 sort of individual people on teams specific guidance
18 in that area.
19 Q. All right, so let me make sure I have
20 this answer correct.
21 You are saying that there's no written manual
22 or written instructional guide to tell people how to
23 allocate a risk rating to a particular transaction,
24 but they were trained how to do it without written
25 materials, is that correct?

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A. Yes.

Based on the guidance that was actually contained in the guidance that actually gives you the -- each risk rating in previous pages in this -- of the guide.

(Whereupon, an informal discussion was held off the record.)

MR. SCHWARTZ: Well, I would request, to the extent we don't have it, what she's describing, I've never seen.

MR. BLACKMAN: She was describing earlier pages of this very document (indicating).

MR. SCHWARTZ: No, I don't think that's correct.

MR. BLACKMAN: Well, it is correct. If you look at it --

BY MR. SCHWARTZ:

Q. Is that correct?

A. It is, yeah.

Q. Just talking about training outside the scope of this document (indicating) --

MR. BLACKMAN: She said that people were trained, but that the written material you were provided was what was in

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this document (indicating).

That's what she testified. Now, the document, in fact, lists the various risk ratings.

MR. SCHWARTZ: I know that, of course.

MR. BLACKMAN: Well, that's what she said.

BY MR. SCHWARTZ:

Q. My question is, how does a person discretionarily assign a risk rating to a transaction?

MR. SCHWARTZ: And what she testified is that there's no written document that says that.

MR. BLACKMAN: Other than within this document (indicating).

BY MR. SCHWARTZ:

Q. Is that correct?

A. Yes.

Q. But this document does not tell them how to --

MR. BLACKMAN: It lists risk ratings on page 5 --

MR. SCHWARTZ: I know.

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MR. BLACKMAN: -- which is --

MR. GLATTER: Could we go off the record for one second?

THE VIDEOGRAPHER: Going off the record at 1:59.

(Thereupon, an informal discussion was held off the record.)

THE VIDEOGRAPHER: Back on the record, 2:01.

BY MR. SCHWARTZ:

Q. Simply, what I'm trying to determine is how an individual inputting data into the Goalkeeper system and assigning a risk rating makes a determination what that initial risk rating should be.

Is what we have on 237 (indicating) all the information that person would have at their fingertips in order to make that determination?

A. That's the information, yes, the definitions of the risk ratings on the Goalkeeper system, and as training for individuals when they became a case space user you would on an ad hoc basis sort of give them examples of the type of risk rating that you would use with a particular case.

That was very much on an ongoing training basis

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actually using a case in front of you to key, to build up that member of staff's experience.

Q. All right.

So you are saying there are training that materials that have examples --

MR. BLACKMAN: No, she didn't say that, on an individual basis.

Why do you assume there's a document when --

MR. SCHWARTZ: Give your voice a rest, Mr. Blackman.

THE WITNESS: It wouldn't actually be a document, but -- no.

It would be that sort of discussion, a training discussion as you were sitting with someone keying a space.

BY MR. SCHWARTZ:

Q. The trainer would make them up on ad hoc basis?

A. The trainer would have some knowledge gained through experience of the types of cases being put on Goalkeeper and which circumstances you would use risk ratings.

Q. Have you personally been trained on how to make determinations of how to make risk ratings?

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1 A. I was one of the Goalkeeper trainers.
2 Q. You were one of the trainers?
3 A. Yes.
4 Q. Well, if we look at red, for example, on
5 page 237, it says "The individual company address or
6 number is known to this office."
7 Now, what do we mean by "this office" there?
8 A. If it was known to Group Investigations
9 of Fraud or Group Financial Crime, the -- the fraud
10 unit.
11 Q. And -- and what does "known to this
12 office" mean?
13 A. So had previously come to the attention
14 of that -- that office.
15 So, for example, there would be a case already
16 on the system.
17 Q. Is that the only example of "known to
18 this office," a case filed in Goalkeeper?
19 A. Yes.
20 Case or cases would be filed into a case
21 manager system whether it be Goalkeeper or the fraud
22 management system.
23 Q. Okay. In the absence of a filing in
24 Goalkeeper or the predecessor, a -- an entity is not
25 known to this -- not known to this office for

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1 purposes of this -- this instruction (indicating),
2 correct?
3 A. Yeah.
4 If it's known to the office, it would be on a
5 case management system.
6 Q. Okay. Therefore, is it true that an
7 initial recording of a suspicion can never be red?
8 A. It wouldn't --
9 Not necessarily. It could be known to the
10 office for a different type of case.
11 Q. Okay. I asked that question
12 incorrectly --
13 A. Okay.
14 Q. -- and I'm sorry.
15 Is it true that the first instance of a filing
16 of a Goalkeeper report pertaining to any individual
17 entity can never be red?
18 A. No.
19 If you see the second bullet point (indicating)
20 under the red, it's the actual sort of nature of the
21 incident could give serious grounds for concern,
22 could be the -- the alternative.
23 Q. Because it's and/or --
24 A. And/or.
25 Q. -- correct?

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1 A. Yeah.
2 Q. Okay.
3 So when it says the nature of the incident
4 gives serious grounds for concern, is that again a
5 discretionary determination by the person inputting?
6 A. It is.
7 Q. There are no guidelines for what
8 constitutes a serious ground for concern?
9 A. No.
10 Q. All right.
11 Let's move on, then, to page 249, please, where
12 we talk about adjusted risk ratings. It says
13 "over" -- do you have that?
14 A. Yes.
15 Q. It says "Overnight, the database runs a
16 process that looks at all the key information data
17 and searches for any exact matches according to a
18 set of rules where the risk ratings differ."
19 Do you know what are the rules described there?
20 A. So -- yeah, from --
21 I can talk about them in terms of what I
22 recollect about them --
23 Q. Yes.
24 A. -- that being a fairly long time ago that
25 we were actually setting -- setting these rules

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1 (indicating).
2 But an exact match could constitute an exact
3 match on a surname, a first name, and a date of
4 birth, so if all those elements of a case were
5 exactly the same, that would constitute an exact
6 match.
7 You could have an exact match with a house
8 number and a post code, or a house name and a post
9 code, or you would have an exact match on maybe a
10 business name, so --
11 So what was recorded in two business name
12 fields would be exactly the same, would constitute
13 an exact match.
14 Q. And if it finds matches --
15 Well, if it finds matches it adjusts the risk
16 rating upwards, yes?
17 A. Yes.
18 There are two columns on the Goalkeeper case,
19 one which is the actual risk rating which the
20 inputter has assigned to the piece of key
21 information which are the names, addresses, company
22 names, et cetera.
23 And then one column which is the suggested
24 adjusted risk rating, which might be -- you can see
25 detailed there (indicating), so two potential -- two

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1 green ratings could be adjusted up to an amber risk
2 rating.
3 Three green ratings could become a red, so --
4 so that gives you the two columns on the case
5 (indicating).

6 Q. Okay.

7 Now, it says "Overnight, the database runs the
8 process." Is it run every night?

9 A. It does, yes.

10 Q. Is it run every night on every Goalkeeper
11 case report?

12 A. It's an overnight batch process that
13 looks at all the different -- at all the key
14 information.

15 Q. Is there any process or set of rules that
16 would result in a risk rating being moved down,
17 reduced?

18 A. No. No, I don't think that it would,
19 actually.

20 Q. So once an entity is adjusted up to red,
21 it stays red permanently?

22 A. Potentially only if a user went in and
23 changed a rating to a different type of rating, and
24 the next overnight batch it might change the
25 adjusted rating.

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1 Q. Well, if the historical records were red
2 and someone inputted a new matter with the same
3 information that would adjust, even if they inputted
4 green --

5 We don't really have a green and a red, but
6 presumably it will be adjusted up? The green would
7 be adjusted up, wouldn't it?

8 A. If there was already a red on the system.

9 Q. Yeah.

10 A. It would look to adjust -- adjust that
11 risk rating.

12 Q. But the inputting of the green wouldn't
13 adjust the red down, would it?

14 A. No.

15 Q. The red that already existed would adjust
16 the green up? Isn't that correct?

17 A. Yes.

18 Q. So other than someone coming in and
19 deleting -- can someone do that, delete a risk
20 rating?

21 A. You can delete a piece of key information
22 from a case, so yeah, you could.

23 The capability is on the database to delete a
24 name, company name, address telephone number.

25 Q. All right, so a person is inputting key

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1 information for a new matter, and they do their
2 search.

3 Overnight, the automatic search is run, and it
4 adjusts them up to red. The next day they see they
5 are adjusted up to red. They don't like it, they
6 want to adjust it back down. Can they do that?

7 A. No. The -- the adjusted risk rating
8 remains --

9 Q. Remains?

10 A. -- as it is.

11 Q. That's out of their discretionary
12 control?

13 A. Yeah. An inputter can't change the
14 adjusted --

15 Q. I understand.

16 A. -- rate.

17 It can only change a risk rating that you've
18 manually allocated to a --

19 Q. Okay.

20 THE REPORTER: Sorry? Manually
21 allocated to a what?

22 MR. SCHWARTZ: "To a record."

23 BY MR. SCHWARTZ:

24 Q. Is there some sort of central listing of
25 red ratings?

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1 A. Not as far as I'm aware.

2 Q. Once an entity is -- is risk rating of
3 red, is that information disseminated to anyone
4 within the bank?

5 A. No.

6 On Goalkeeper 3, there is a report produced
7 that details adjusted risk ratings, but that was
8 specific functionality for Goalkeeper 3.

9 Q. So it didn't begin until late 2004, 2005,
10 is that correct?

11 A. No. That report didn't exist before
12 that.

13 Q. But prior to that, from Goalkeeper 3, no
14 one received the information that certain entities
15 were risk rated red?

16 A. No. It wasn't disseminated.

17 Q. So to find out an entity was risk rated
18 red, it would have to be someone going into
19 Goalkeeper who had access to the key space records.
20 Those are the only people who could only find out
21 with about the risk rating, correct?

(Thereupon, an informal discussion was
22 held off the record.)

23 MR. SCHWARTZ: Case base records.

24 C-A-S-E, B-A-S-E, records.
25

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1 as far as that transaction is concluded?
2 A. Yes.
3 Q. And if there are multiple reports to
4 NCIS -- three, four, five from one entity -- each
5 time NCIS tells the bank to take no action?
6 There is nothing further that increases the
7 bank's responsibilities as a result of multiple NCIS
8 reports?
9 I'm sorry, perhaps I didn't ask that -- what
10 I'm trying to find out is, what is the cumulative
11 effect?
12 MR. BLACKMAN: If any?
13 BY MR. SCHWARTZ:
14 Q. If any, of multiple NCIS disclosures on a
15 particular entity when the police or whoever takes
16 no action.
17 A. So with --
18 If there were a number of money laundering
19 suspicion reports received in connection with one
20 particular customer --
21 Q. Yes.
22 A. -- over a period of time, that
23 potentially would trigger an internal review in
24 terms of actually the KYC and monitoring of that
25 account. It -- so it could trigger a review.

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1 Q. Would the bank ever close an account
2 based upon multiple disclosures?
3 A. That's a potential outcome.
4 Q. Despite the fact that no orders came
5 through from NCIS?
6 A. Yeah, so the --
7 This sort of external influences of law
8 enforcement wouldn't necessarily impact a decision
9 if there were multiple suspicion reports received,
10 and that could result ultimately in the closure of
11 an account.
12 Q. And in your experience, did it ever
13 result in the closure of an account?
14 A. In my experience, yes.
15 Q. All right.
16 Let's take a look, please, at what I labeled as
17 Baugh Exhibit 3. You want to take a minute and read
18 it through?
19 A. Please.
20 Q. Sure.
21 (Pause)
22 BY MR. SCHWARTZ:
23 Q. You've read it?
24 A. I have scanned through it, yes
25 (indicating).

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1 Q. Okay. I was going to ask you some
2 objective questions about that.
3 On page 2 of the document, the initials ITW --
4 that's Ian Wickens?
5 A. I believe it is, yes.
6 Q. Ian Wickens, yes?
7 And the date there (indicating) would be March
8 30th, '01?
9 A. Yes. Uh-huh, yes.
10 Q. Turn to the first page, please.
11 Do you recall ever seeing this before
12 (indicating)?
13 A. No, I don't recall.
14 Q. So you did not review this document in
15 preparation for this deposition?
16 A. No, I haven't seen this document
17 (indicating).
18 Q. Do you know what this document is?
19 A. From reading the document, I can see it's
20 some team guidelines for the Money Laundering
21 Reporting Team.
22 Q. But as a 30(b)(6) witness on the issue of
23 Goalkeeper, and personally, Fleur Baugh, you're not
24 prepared to discuss the contents of this document
25 (indicating) other than from your own objective

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1 knowledge outside of this document (indicating)? Is
2 that correct?
3 A. I can discuss the document.
4 As I'm saying, I haven't actually seen it
5 before.
6 Q. Right, prior. Prior to --
7 (Thereupon, an informal discussion was
8 held off the record.)
9 BY MR. SCHWARTZ:
10 Q. Prior do this deposition, you never saw
11 this document?
12 A. I don't recall seeing this document
13 (indicating).
14 Q. You don't know why this document was
15 created (indicating) --
16 A. I --
17 Q. -- other than by reading it?
18 I can read it too, but you have no more
19 substantial knowledge?
20 A. I don't have specific knowledge of why it
21 was written by Ian.
22 Q. Okay, so let me just ask you a few
23 questions, and we will see what you can do here.
24 First of all, who is the Intelligence Team?
25 A. I don't know which team Ian is referring

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1 screen.
2 Q. So, then, you are saying EL is part of
3 ISS?
4 A. It would be a screen on that.
5 Q. In ISS? Okay, so we will assume PH and
6 AS, but you don't know?
7 What about RB?
8 A. I don't know what that refers to.
9 Q. Next bullet says "Reviewing all accounts
10 for at least the previous 12 months whether by
11 ordering and examining ledgers, or by" -- there are
12 four numbers, "et cetera, terminal inquiries." Do
13 you know what those are?
14 A. I don't know which -- the specifics of
15 what each of those numbers would call up, but it
16 would be ledger based data (indicating), so what was
17 happening on an account transactions.
18 Q. The last bullet point says "As part of
19 your documentation, you should be checking GK
20 records."
21 I assume that means Goalkeeper?
22 A. Yes.
23 Q. "Not only for previous reference to the
24 subject of the report, but in relation to any third
25 parties who play a significant role in the

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1 circumstances of the report."
2 Now, I mentioned this earlier but I'm just
3 going to ask it again in this context. You can
4 search third parties in Goalkeeper, that's correct?
5 A. Yeah. You can put any name into
6 Goalkeeper and see whether there's a match on the
7 system.
8 Q. All right, so let's say you got a list
9 from the Bank of England, and it had an entity. Bob
10 Smith is now on the EU -- Bank of England list, but
11 you don't have a customer named Bob Smith.
12 Could you go into Goalkeeper, Bob Smith -- feed
13 the name Bob Smith in -- get a bunch of results back
14 and find that several different accounts had made
15 payments to Bob Smith?
16 A. So when did you a search of Goalkeeper,
17 you would search for the name Bob Smith, and any
18 case where that name has been keyed onto the
19 database in the key information data field, it would
20 pull up a list off those cases.
21 Q. So you could find that there were
22 multiple cases involving payments to Bob Smith, is
23 that correct?
24 A. If Bob Smith had -- has been put on --
25 If the detail Bob Smith had been put on a

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1 Goalkeeper record as a name --
2 Q. Yeah.
3 A. -- it would call it up and list it.
4 Q. And are Goalkeeper reports searchable on
5 all parameters?
6 A. You can --
7 So using the search engine, you can search for
8 personal names, dates of birth, addresses, company
9 names, telephone numbers.
10 Q. If you wanted to find out all the
11 Goalkeeper reports that were filed within a specific
12 date range, could you do that, too?
13 A. So -- yeah.
14 On Goalkeeper 2, there was some basic
15 functionality that did allow you to put a "from"
16 date and a "to" date, and you could select all
17 records in that date that say -- had the name Bob
18 Smith --
19 Q. Yeah.
20 A. -- or featured a specific post code or in
21 fact were a specific record type.
22 Q. That reminds me of a question I wanted to
23 ask you going way back, now.
24 You said the implementation of Goalkeeper 2 was
25 in order to add a case management facility to the

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1 search facility that was in Goalkeeper 1, is that
2 correct?
3 A. Yes.
4 Q. Can you tell me what -- as I thought
5 about it, it became sort of unclear to me.
6 So what exactly are the case management
7 functions that were inserted into the newer version
8 of Goalkeeper that became Goalkeeper 2?
9 The functions that were not part of
10 Goalkeeper 1?
11 A. So it's the case base, so if you look at
12 the user guide here (indicating), it's everything
13 that's mentioned for a case base user, so creating a
14 record, being able to update records.
15 Q. Were there records created on
16 Goalkeeper 1?
17 A. On Goalkeeper 1 it was a purely a search
18 engine, so the data was loaded into the system and
19 people could search on it.
20 You would get a list of exact and potential
21 matches with a reference number, but that reference
22 number actually referred you back to a paper file
23 and you had to go pull the paper file.
24 Q. I see.
25 A. Yep, so --

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1 Q. Was color always part of the Goalkeeper
2 record?
3 A. Sorry? What? Could you repeat the
4 question?
5 Q. A lot of what has been produced to us has
6 been produced to us black and white.
7 A. Right.
8 Q. Some in color.
9 I am just curious as to when color was added.
10 what can you tell me about that?
11 A. So color in terms of the risk ratings,
12 you've always been able to see the color --
13 Q. Yeah.
14 A. -- of the risk ratings in Goalkeeper, but
15 that would be the primary color on a record other
16 than the just general background of the database
17 being either blue or --
18 Q. Did -- sorry. Didn't mean to cut you
19 off.
20 THE REPORTER: Sorry? Blue or what?
21 THE WITNESS: "Blue or yellow."
22 BY MR. SCHWARTZ:
23 Q. So other than what you've mentioned so
24 far, which is the addition of the new form for
25 sanctions in terror funding, the change in linking,

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1 to automatic, and the cosmetic changes, any other
2 changes in Goalkeeper 3 that you know of?
3 A. Some additional fields were added to some
4 of the key information data.
5 For example, if you put a name on the system
6 and you had details of nationality, of a passport
7 number, a driving license number, occupation, those
8 sorts of things, you could also actually now key
9 those onto the database.
10 Q. Anything else?
11 A. At the moment, those are the main things
12 that spring to mind.
13 Q. Those are the main changes --
14 A. Yeah.
15 Q. -- in Goalkeeper 3 that you can remember?
16 A. Yes.
17 Q. Okay.
18 MR. SCHWARTZ: Patrick, were you able
19 to get any copies of this (indicating)?
20 (Thereupon, an informal discussion was
21 held off the record.)
22 MR. SCHWARTZ: I need a few copies.
23 MR. SHELDON: Copies, or actual -- do
24 you have it printed already?
25 MR. SCHWARTZ: Yeah, I have my own.

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1 I just need --
2 (Thereupon, an informal discussion was
3 held off the record.)
4 BY MR. SCHWARTZ:
5 Q. Ms. Baugh, I'm going to ask the reporter
6 to mark as Baugh Exhibit 4 a document that is Bates
7 numbered NW162188 through 162193.
8 (Thereupon, a document was marked by
9 the reporter as Baugh Exhibit 4 for
10 identification.)
11 BY MR. SCHWARTZ:
12 Q. Ms. Baugh, have you had a chance to
13 review this document?
14 A. Yes, I have. Thank you.
15 Q. Ms. Baugh, have you ever seen this
16 document before?
17 A. I have seen this document.
18 Q. Did you review this document in
19 preparation for this deposition?
20 A. I did.
21 Q. This is a Goalkeeper report, is it not
22 (indicating)?
23 A. It is, yes.
24 Q. Of the type Money Laundering Disclosure?
25 A. Yes.

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1 Q. It appears to concern events -- well, let
2 me phrase this a different way.
3 It says it was created on May 12th, 1990? Is
4 that correct?
5 A. That's right, yes.
6 Q. Looking at this document (indicating), is
7 it possible for you to determine what precipitated
8 the filing of this Goalkeeper report on May 12th of
9 1990?
10 A. So the record itself was transferred onto
11 Goalkeeper 2 from the Fox database.
12 Q. Yes.
13 A. So the record would have originated on
14 the Fox database.
15 The transfer would take the date it was created
16 on the Fox database and bring it into the Goalkeeper
17 record, and it was a money laundering.
18 It was a money laundering disclosure record on
19 the Fox system, which was the system used before
20 Goalkeeper.
21 Q. Would you look, please, at 16191 and 2
22 (indicating)?
23 A. Yeah.
24 Q. Is this a money laundering disclosure?
25 A. So yes, this is a very old-style money

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A. Yes.

Q. "For backgrounds info and particularly the activities seen on the USD account."

* MR. SCHWARTZ: Now, I don't believe I've ever seen that memo or any response. I believe that what we have here (indicating) is the end of the 647655 record. 8373 is the end of it.

THE WITNESS: So looking at the case, and the key correspondence, no, there doesn't appear to be a memo attached to the case.

MR. SCHWARTZ: All right. I'm not implying that you have failed to do so.

MR. BLACKMAN: We will, certainly.

MR. SCHWARTZ: Please.

MR. BLACKMAN: I'm sorry, we have to do better.

You've asked for us to look, and I said of course, we will take it under advisement.

MR. SCHWARTZ: Okay.

MR. BLACKMAN: And if the document, I imagine if the document existed as of the time of this case, it would have been

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preserved and produced, but we will certainly check.

MR. SCHWARTZ: It should have been attached if it exists. It should have been attached to the Goalkeeper report.

MR. BLACKMAN: That's not clear.

MR. SCHWARTZ: Let's ask the witness.

BY MR. SCHWARTZ:

Q. If -- if the information that appears to have been called for does in fact exist, it should be attached to this record, should it not?

A. Certainly the process was for relevant documents to be attached to the Goalkeeper record to form part of the case --

Q. Certainly --

A. -- and that's the general rule.

Q. I'm sorry. I didn't mean to interrupt.

A. That's all right.

Q. He says a memo was sent to the relationship manager.

Certainly that memo should be attached, should it not?

A. So certainly the process was for relevant documents to be attached to the Goalkeeper case with -- with the functionality available.

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Q. Isn't it also the case that any memo sent to the relationship memo -- manager should end up in the customer file?

A. I -- that would depend whether the relationship manager kept that. I don't know the individual processes within the business.

Q. Okay.

You will have to -- your expertise, I appreciate that.

A. Yeah.

MR. SCHWARTZ: Well, if you will give me one minute off the record, I may be through.

THE VIDEOGRAPHER: Off the record, 4:15.

(Recess taken at 4:15 p.m.)

(Resumed at 4:26 p.m.)

THE VIDEOGRAPHER: Back on the record, 4:26.

(Thereupon, a document was marked by the reporter as Baugh Exhibit 7 for identification.)

BY MR. SCHWARTZ:

Q. Ms. Baugh, I've handed the reporter a document Bates numbered NW166235 through NW166251

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(indicating).

Have you had a chance to review this document?

A. Yes, I've had a quick look through (indicating).

Q. I'm going to ask you one question on one page, so we will get to that in a minute;

But this appears to be a Goalkeeper report also, doesn't it?

A. Yes, it is.

Q. And it is a Money Laundering Disclosure?

A. Yes, it is.

Q. Attached to it, in fact, is a disclosure to the NCIS?

Is that correct?

A. Yes, that's correct.

Q. If you'd turn with me, please, to 162240, let's read through that note, please.

Do you see the two separate notes? Both have, near the end of them, the statement "We report this matter for intelligence purposes"?

A. Yes.

Q. Can you tell me what that means, please?

A. So generally, that would be used by the Money Laundering Reporting Team to report what was happening on the account to NCIS for intelligence.

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EXHIBIT 53 to Declaration of Joel Israel

GOALKEEPER II

COMPLEX

USER GUIDE

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A. INTRODUCTION

A.i) Goalkeeper II (GK II):

Goalkeeper II (ver 1.0) is a networked Intranet based database which records details linked to suspected fraud or money laundering incidents across the RBS Group. Businesses and central group functions potentially have access to the functionality outlined below.

A.ii) Manual Search Utility:

Any user with access to the Group Intranet can potentially search from their desktop against names, company names, addresses and telephone numbers linked to previous incidents of actual or suspected fraud or money laundering. The search facility will return either "exact" or "possible" (defined as sounds like or contains) matches. In the event of a match, users are presented with a case reference number for onward referral to an appropriate control authority – see Case Base below. The type of data available for searching within each business area is set using a 'control grid' – see also below.

A.iii) Case Reference Database:

A limited number of Control Authorities within each business have been set up with desktop intranet access to the Case Reference Database (Case Base), containing the detailed fraud/money laundering suspicion records from across the group. Functionality includes:

- Desktop access to detailed fraud/Money laundering case files, for use in investigating hits generated by manual or automated searching within the business (see below).
- Desktop creation of new Case Base files, following local incidents involving actual or suspected fraud and money laundering.
- Desktop analysis of fraud data to create statistics, and identify patterns/trends/links between cases.

A.iv) Automatic Search:

Goalkeeper II can generate extract data files containing all or specific categories of key fraud and money laundering data (e.g. company names, addresses) for automated use by local businesses, e.g.:

- Automated screening of new clients/applicants for business, as part of initial application processing/due diligence.
- Retrospective screening of an existing customer base, in order to identify when other businesses create new casefiles directly relating to your own customers, essentially a form of early warning.

A.v) Data Control Grids:

Each business has a number of data control grids for manual search settings, Case Base settings and

automated search settings. These control grids allow users to select the type, risk rating and age of data that will become searchable for each of these search methods. For example, a business may be only interested in searching key information (i.e. names, companies, addresses etc) dating back 3 years relating to red rated (high risk) suspects who have been linked to Fraud Loss and Fraud Attempt incidents across the group – the control grid can be set to reflect this.

A.vi) Data Risk Ratings:

As mentioned above, all data is rated either red, amber, green, blue or indigo. A summary of each grade of data is as follows:

Red: Extreme caution is advised

- The individual, company, address or number is known to this office, &/or
- The nature of the incident gives serious grounds for concern.

Amber: Caution is advised

- The individual, company, address or number is not previously known to this office &
- The nature of the incident gives potentially serious grounds for concern.

Green: Some grounds for extra caution may exist

- The party may have been involved on the periphery of a potential incident, but their role and intention are unclear.

Blue: Innocent Third Party

- This rating can be used to record the details of the victim of a fraud or of an innocent third party who may be connected with an incident. Data with a blue risk rating is not searchable via the key information manual search.

Indigo: Misrepresentation

- This rating can be used when we have information that suggests an individual or company has been the victim of impersonation.

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A.vii) User Undertaking:

A match on Goalkeeper II should be taken to indicate that information is held centrally which may be of relevance to users carrying out due diligence and which may be of assistance in the decision making process. No other inference is implied or intended.

The Goalkeeper database contains confidential material, access to which is restricted to authorised personnel only. Approved users should not allow any unauthorised bank staff to carry out searches on the database or to view information contained on it. Information contained on the database must not be disseminated to unauthorised third parties.

Data held on Goalkeeper should only be accessed by users in support of their legitimate bank duties.

All users are understood to have consented to the above user undertaking. Disclosure of materials to an unauthorised third party or abuse of data contained on the database may amount to disciplinary action against the user.

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B. GENERAL INFORMATION

B.i) Accessing Goalkeeper II: Goalkeeper II is an Intranet based database that can be accessed from Internet Explorer, Netscape or other web browser.

In order to access the database, simply go into Internet Explorer and type in the following URL and press enter:

<https://www.goalkeeper.web.rbsgrp.net/>

GKII security requires that all Case Base users have a certificate loaded onto their PC in order to access the database – this certificate must be installed by each user prior to accessing Case Base. You will be asked to confirm this certificate each time you go into the database.

You can save the GKII URL as a favourite/bookmark. Subsequently each time you need to go into Goalkeeper II you can select the relevant address from your list of favourites.

B.ii) Main Menu Options:

The menu is located on the left-hand side of the screen, and the following options are potentially available to Case Base users:

Key Information Search:

The key information search is available to all manual search users. Specific types & grades of key information taken from the detailed case reference database (Case Base) files have been selected by each business across the Group and can be searched via a manual search. Manual search users do not have access to the detailed Case Base files. Case Base users can access the data that is available to manual search users by selecting the Key Information Search.

Case Base:

Search – This menu selection allows a Case Base user to carry out a search of the Case Reference Database key information – which will differ from the Key information search above, due to the settings on the relevant control grid. Case Base records can be accessed for editing from the search result field by clicking over the case reference number.

Create Record – This menu selection allows a Case Base user to input records onto the database.

Analysis:

Statistical – This selection will allow Case Base users access to statistical information concerning case record data in any given time period.

Pattern - Pattern searching provides the user with an analytical tool that can search the total database for

matches against pre-selected criteria, and then provide a list of all the records that match the data/criteria searched on. It is a tool that can be used to look at past or developing trends using wide or narrow search criteria.

Admin:

Change Password – Use this option to change you GKII password. GK password must be at least 9 digits, one or more of which should be number(s).

B.iii) Active Links:

Where an item appears highlighted and underlined, this indicates that it is an active link and can be clicked on with the mouse to access the relevant page on the database.

For example, from Case Base search results click over the case reference number to access the case file, or having selected a case file, click over any attachment name to access the attachment.

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C. SEARCHING GOALKEEPER II

C.i) Searching GKII: A Case Base user can search Goalkeeper II using either the Key information search (search utility available to manual search users across the Group), or the Case Base search utility.

Key Information Search: The following fields are available to all manual search users using the key information search:

- ***Surname***
- ***First name***
- ***Date of Birth***
- ***House Number***
- ***House Name***
- ***Street Name***
- ***Post Code***
- ***Telephone / Fax Number***
- ***Company Name / Business Name***
- ***Company Reference Number***

The key information data for manual searches is restricted by the control grid settings, so it will differ from the data available for searching on a Case Base search. For example, key information selected for manual searching will not include blue data (innocent third party data) and may be further restricted by the age of data and record types selected for searching by a particular business.

It is not possible to access the detailed Case Base records from the manual search utility – this can only be done from Case Base. Manual Search users are able to view External Data records and attachments only. Manual Search utility users should refer all exact matches and any relevant possible matches to their relevant control authority.

Case Base Search Utility: The above listed key information fields are available for searching, but this utility includes a **reference number search field**. It is also possible to **go directly into a Case Base record** by clicking on the reference number with the mouse.

Access to Searches: The manual search can be accessed from the main menu by clicking on *Key Information - Search* with the mouse, and the Case Base search can be selected by clicking on *Case Base - Search* with the mouse. Although the data being searched for each search utility is different, the basic search functionality is standard.

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C. ii) Name Searches - Individuals

Searching a Name:

When searching a name enter the surname, as it appears, in the surname field and the first name, if you have it, in the first name field and press enter or click on search with the mouse.

It is not possible to search for first name only, but you can carry out a search with only a surname entered.

Exact Matches:

An exact match will be returned where the details entered in both the surname and the first name fields are exactly the same as those of data held on the key information database. Exact matches will appear in bold red at the top of the list of matches.

Possible Matches:

Any other possible matches will be listed (in blue) alphabetically below exact matches. Possible matches are created by the sounds like & contains facility (see below).

Sounds Like & Contains:

A surname search looks for an exact match on the surname entered, but will also look for sounds like and contains matches using that surname. For example, a search of the surname Smith would call up all records where the surname recorded is Smith, but would also call up records containing, or which sound like Smith, i.e. Arrowsmith, Goldsmith or Smythe.

Possible matches are listed according to a match on the surname searched, followed by all sounds like and contains options in alphabetical order.

It is always advisable to scroll through the possible matches to look for close matches, where the name may have been misspelled or misrepresented in some way.

C. iii) Date of Birth Searches

DOB Search:

If you wish to search for a particular date of birth only (i.e. not associated with a particular name) enter details in the Date of Birth search field – **e.g. 01 May 1970.**

Exact matches only on the date of birth searched will be returned.

Name & DOB Search:

If you search a name and a date of birth at the same time, the system will look for an exact match on the name **with** the date of birth entered.

This search will not return any other matches where the date of birth entered appears on the database in connection with a different name. In order to search for any records on which a particular date of birth appears, carry out the above **DOB** only search.

C.iv) Company / Business Name Searches

Searching a Name:

When searching for a company or business name, you can enter the name in the company/business name search field and any exact or possible matches will then be listed. Exact matches are listed first in red and possible matches are sorted alphabetically below exact matches in blue. See page 10 for further details of exact, possible and sounds like / contains matches.

Company Reference Number Search:

A search of company reference numbers (i.e. the registration number in the country of incorporation) is also possible, however if a search of a company reference number results in no matches, a company name search, as described above, is recommended.

In order to carry out a company reference number search, simply enter the registration/reference number available – any exact matches with the number entered will be returned.

C.v) Address Searches

There are a number of ways of searching for an address on the database. The relevant fields available for searching are:

- ***House Name,***
- ***House Number,***
- ***Street Name &***
- ***Postcode.***

House Name Search:

A search of a house name can be carried out by entering the relevant details in the house name field only, in which case no other element of the address would be searched in this instance.

A match will be returned where the data entered matches a house name on the system or where the contains/sounds like facility has picked up data which contains elements of the house name entered.

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Possible matches are sorted alphabetically by postcode where one is available.

**House Name &
Street Name Search:**

Where you have a house name and street name, details can be entered into the relevant search fields.

An **exact match** would be returned where both the house name and street name are recorded on an address contained on the key information database.

Possible matches would be returned where the contains/sounds like facility has picked up data containing the house name or street name. These matches are sorted alphabetically by postcode.

**House Number &
Street Name Search:**

Where you have a house number and street name, details can be entered into the relevant search fields.

An **exact match** would be returned where both the street number and street name are contained on a record on the key information database.

Possible matches would be returned where the contains/sounds like facility has picked up data containing elements of the street name searched on but not the house number. These matches are sorted alphabetically by postcode where one is available.

Street Name Search:

A search of the street name only would return an **exact match** if the street name as entered was found, and **possible matches** where that street name appears on, or is contained in, records on the key information database. These matches are sorted alphabetically by postcode where one is available.

Postcode Search:

A search of a postcode only would return **exact or possible matches** where that postcode appears on or is contained in records on the key information database.

By searching part of a postcode e.g. SE3 only, all postcodes containing SE3 would be returned as possible matches. Zip codes & foreign postcodes can be searched using the postcode search field.

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**Postcode & House Name/
Number Search:**

A search of a postcode and house number or name would return **exact matches** where both house number/name and postcode are contained on a record on the key information database.

Possible matches would be returned where there are matches on the postcode only.

All possible address matches are listed alphabetically according to the postcode.

C.vi) Telephone/Fax Number Search

Number Search:

Enter the telephone number in the telephone/fax number search field. This search is not space sensitive, so the number can be entered with or without spaces.

The last 6 digits only of the number entered are searched – this avoids confusion over representations of foreign dialling codes and changing area codes when searching. Any telephone number on the key information database, which contains the last 6 digits of the number searched, will be returned as a possible match.

C.vii) Case Reference Number Search (Case Base search only)

Reference No Search:

If you already know the Case Base reference number of the record that you are looking for, enter it in the reference number search field and click on/press enter.

The Case Base reference number will come up on the screen. The record can be accessed by clicking over the reference number with the mouse. You will then be able to read or edit the file as required. Previous or other reference numbers can be searched using the Previous Reference Number search field.

C.viii) General Information

**Viewing or Editing a
Record:**

If you wish to view or edit a record from the list of exact or possible matches, simply click on the reference number of the record with the mouse and this will take you straight to the relevant record. You will then be able to read the record, or edit it if required. **You can only go directly into a record to view or edit it from Case Base searches.**

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Restricting Search Results:

In order to prevent delays when waiting for search results, it is possible to choose to see the results in batches of 300. This reduces the time it takes for the results of a search to be displayed. Either select to see all records by clicking on the radio button titled **Return all**, or to see the results in batches of 300 by selecting **Return 300 results/page**.

Searching a common name such as Smith with Return all selected can cause a delay in the search results being displayed on the page.

Search Criteria:

Goalkeeper II Searches are not case sensitive.

Helpful Hints:

Use the Clear button after searching to clear all text in the search fields.

Use the forward & back buttons on the tool bar at the top left-hand side of the screen to move around the database.

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D. CASE BASE RECORDS

D. i) Contents of a Case Base Record:

| | |
|-------------------------------------|---|
| Heading | The case number, record type and control authority of each record is displayed in bold at the top of the case file. A Case Base record will also consist of the following fields: |
| Case Record | Numerical case reference number is automatically generated by the database. |
| Status | A case record can be open or closed (see later in Create a Case Base Record for further details). |
| Control Authority | This field shows the 'owner' of the record i.e. business area involved in a particular incident. |
| eCommerce | This field indicates whether the record is linked to eCommerce business. |
| Referral | This field indicates whether the record is the result of a referral. |
| High Profile | This field indicates whether the record is a high profile case eg money laundering where estimated amount laundered is £250,000 or more. |
| Previous References | Any additional or former reference numbers will be recorded in this field. |
| Linked Cases | The reference numbers of any linked cases, i.e. where there is a common name or address which might be connected, can be manually entered in the 'Linked Cases' field. |
| Created/Modified by & on | Details of the user who created or modified the record and the relevant dates will be recorded in these fields. |
| Record Types | <p>A brief summary of the incident and other relevant details is recorded on each Case Base record. There are 9 types of Case Base records, which are used to record details of the following types of incident:</p> <p><u>Fraud Loss</u> - This record type is used to record the details of incidents where a fraud loss to either the RBS Group, a client or third party has occurred. A loss amount <u>must</u> be entered in order to create a Fraud Loss record.</p> |

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Fraud Attempt - This record type is used to record the details of incidents where there has been an attempt to defraud either the RBS Group, a client or a third party, however no money was actually lost. A potential loss amount must be entered in order to create a Fraud Attempt record.

Suspect Approach - This record type is used to record details of incidents where an approach has been made to the RBS Group which has caused concern, however there has been no actual or potential fraud loss.

Money Laundering Suspicion - This record type is used to record details of money laundering suspicions across the RBS Group.

Money Laundering Disclosure - A Money Laundering Disclosure record indicates that a financial disclosure has been made to the relevant authorities.

Legal Process Record - There are 3 types of Legal Process record: Notice of Intent, Production Order or Equivalent and Customer Disclosure Authority.

Notice of Intent: This category is used where we receive notification from the authorities that a production order, or its equivalent, is going to be served in respect of a particular customer.

Production Order or Equivalent: This category is used to record details of legal orders served in respect of RBS Group customers.

Customer Disclosure Authority: This category is used to record details of customer disclosure authorities received by the RBS Group.

External Data - This record type is used to record external information which is in the public domain, for example details of regulatory actions, press information etc.

Referral Records – This record type is used to indicate records on the database that are the result of any internal referral process.

General Intelligence - This record type has been used to record details of old Fraud Office intelligence files and cannot be selected to create a new Case Base record.

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Key Information

Details of individual names, date of birth, company/business names, addresses, telephone numbers and account details which are connected with the incident/record, will be listed on each record.

Risk Ratings

All individual names, company/business names, addresses and telephone number data entered onto Goalkeeper II is allocated a risk rating, see A.vi) for a summary of each risk rating.

Adjusted Risk Ratings

Overnight the database runs a process that looks at all the key information data and searches for any exact matches, according to a set of rules, where the risk ratings differ. Once any exact matches are found, the process will compare risk ratings, and make any adjustments necessary, examples are as follows:

- 2 green ratings would be adjusted to amber,
- 3 green ratings would be adjusted to red,
- 2 amber ratings would be adjusted to red,
- 2 red ratings – no change,
- A green & an amber rating for the same key information would be adjusted to reflect the higher rating of amber,
- An amber and a red rating for the same key information would be adjusted to reflect the higher rating of red.

The adjusted risk rating appears in a separate column on Case Base records.

Case Notes

This field is used for any internal case notes and updates.

Summary / Assessment

This field is used to record additional factual details about the incident and an assessment of the situation.

Conclusion

Records will have a conclusion for the incident recorded. These can either be a pre-scripted or free text conclusions.

Key Correspondence

Any attachments, such as word documents, letters, application forms, suspicion reports, receipts, copies of a disclosure to NCIS or an internet page etc, will be listed in the 'Key Correspondence' section. Clicking on the title with the mouse can access the attachment.

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D. ii) Creating a Case Base Record.

| | |
|---|--|
| D.ii.a) <u>New Case:</u> | Go to Case Base on the menu and click on Create Record with the mouse. This will call up the New Case screen. |
| Year | The year of the record is automatically filled in to show the current year. This need only be changed if you are updating the database with historical records. |
| Control Authority | Indicates the relevant business area. This field will default to the relevant control authority according to the logon id of the user. |
| Record Type | Select the relevant record type from the drop down menu according to the type of incident to be recorded. Only one can be selected. (Some users will not be able to select money laundering suspicion records or disclosure records. The creation of these record types is restricted to authorised users only). |
| Created On | The date will be automatically filled in to show the current date. This need only be changed if you are updating the database with historical records and therefore need to change the date. |
| Modified On | This date will be filled in automatically if the record is modified/edited. |
| Status | Status will automatically default to open. A record will stay open for 2 weeks (unless user has selected closed) and if it is not updated for 2 weeks will revert to closed status. If a closed record is updated, it will remain open for a further 2 weeks before reverting to closed status again unless closed status is selected on update. |
| E Commerce | If a record is related to E commerce in some way, yes can be selected from this drop down menu. |
| High Profile | If the record is a high profile case, select yes. |
| Referral | If the record is the result of a referral, yes can be selected from this drop down menu. |
| Created by & Modified by | This field will be completed automatically from the logon id used. |
| Previous Reference Numbers | Any relevant additional reference numbers can be recorded in this field. This field is not searchable on Case Base. |

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| | |
|---|--|
| <i>Linked Cases</i> | If there are any linked cases, fill in the linked case field with the relevant linked case file number when entering the new case file onto the database. This process will automatically load the newly created case file number into the linked case field of the existing Casebase record. |
| <i>Next Page>></i> | Click on this button to move onto the next page. |
| <i>D.ii.b) <u>Summary of Incident:</u></i> | The fields to be completed in this section will differ depending on which record type has been selected. An outline of each record type and the relevant fields to be completed is as follows: |
| <i><u>Fraud Loss Record:</u></i> | In order to create a Fraud Loss record a loss must be entered in the 'Actual Loss' field. |
| <i>Loss by</i> | Select either RBS Group, Client or 3 rd Party from the drop down menu. Only one can be selected. |
| <i>Potential Loss</i> | Enter potential loss if relevant. |
| <i>Actual Loss</i> | This section must be completed for a Fraud Loss record. If no actual loss is entered the record will change to a Fraud Attempt record |
| <i>Recovered Funds</i> | Any funds recovered can be entered in this field. |
| <i>= Net Loss</i> | The net loss is automatically calculated from the above loss fields. |
| <i>Summary</i> | The summary provides a brief description of the incident. Select the summary(ies) that most closely describe the type of fraud concerned by clicking in the relevant box (a tick will appear in those selected). If none are relevant, select other and complete a brief description of the fraud in the free text case notes or summary field, available later in the record. |
| <i><u>Fraud Attempt Record:</u></i> | In order to create a Fraud Attempt record the 'Potential Loss' field must be completed. |
| <i>Attempt Against</i> | Select either RBS Group, Client or 3 rd Party from the drop down menu. Only one can be selected. |
| <i>Potential Loss</i> | Fill in the amount in the potential loss field. If the actual loss field is filled in, the record will automatically become a Fraud Loss record, rather than Fraud Attempt. |

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Summary

The summary provides a brief description of the incident. Select the summary/ies that most closely describe the type of fraud concerned by clicking in the box (a tick will appear by those selected). If none are relevant, select other and complete a brief description of the fraud in the free text summary field, available later in the record.

Suspect Approach Record:

Approach to

Select from RBS Group, Client or 3rd Party.

Reason for Concern

Select any relevant reasons for concern from the list available – more than one can be selected.

Money Laundering Suspicion Record:

Business Units that usually submit suspicion reports to Group Fraud should continue to do so, for inclusion on the database.

Branch / Area

Free text field to record details of the branch or business area submitting the suspicion report.

Sort Code

Enter relevant sort code if applicable. **This section must be completed where no Department (below) has been selected.**

Department

This field records which area/unit within the broader business area has submitted the money laundering suspicion report. Select from a drop down menu of areas/units. **This section must be completed where no sort code is filled in.**

Submitted By

Free text field to record the contact name of the individual submitting the report.

Contact Number

Free text field in which to record a contact number for the above.

Legislation

If known, select relevant legislation from the drop down menu.

Reason(s) For Suspicion

One or more of the reasons for suspicion can be selected from this list by clicking in the relevant box (a tick will appear by those selected). This section is designed to provide a brief overview – if none of the reasons are relevant, select other and fill in the free text summary later in the record.

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Transactions:

When entering a money laundering suspicion record a transaction box will be available situated with the key information entry fields. The transaction section can be used to record details of suspicious transactions. Select **Add** on the right in the money laundering transaction data box, fill in the transaction date, type, currency and amount. Click on **ADD** button. These transactions can be used to form part of the disclosure information if required.

Money Laundering Disclosure Record:

A money laundering disclosure record is created when a money laundering suspicion record is edited and an electronic disclosure sent to NCIS. **Only authorised users can create and send electronic referrals direct to NCIS.**

Legal Process Records:

Business Units that usually submit legal process information (production orders or disclosure authorities etc) to Group Fraud should continue to do so, for inclusion on the database.

Type

Select the relevant legal process category from the drop down menu. Only one can be selected.

Source

Select the relevant source from the drop down menu.

Enquiry From

Free text field in which to record who the enquiry is from – e.g. Metropolitan Police Fraud Squad.

Enquiry By

Free text field in which to record name details.

Contact Number

Free text field in which to record contact details.

Legislation

Select the relevant legislation from the available list.

Comment

Free text field for any comments – e.g. restrictions to Customer Disclosure Authorities.

External Data Record:

Source

Select the relevant external source from the drop down menu. Only one can be selected.

External Data records and any attachments are **available to all Manual Search users across the RBS Group** (not just Case Base users). It is therefore important that any information recorded on an external data record is in the public domain and is of a non-confidential nature.

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Referral Records:

Referral Field

Where a record is being input as the result of a referral from Goalkeeper II or as the result of another referral process, such as CIFAS, **yes** should be selected in the referral field of the new case section when first creating a record.

Referral Only (Accept)

Select yes in the referral field as described above. If the outcome of the referral is accept (ie not suspect), select **Referral only** from the drop down selection of record types. Then select **Accept/Leave in Branch hands** from the drop down menu titled **Result of Referral**. Next select one of the **Reasons for Referral** from the selection available by clicking in the relevant box with the mouse.

Complete the key information fields (blue risk rating will apply), any other fields necessary, and save the record. The outcome of the record cannot be changed once it is entered as accept/leave in branch hands.

Decline (Suspect or Fraud)

Select yes from the referral field as described above. If the outcome of the referral is decline–fraud or decline–suspect, select a record type that describes the incident i.e. Fraud Attempt or Suspect Approach. Complete the Incident Summary Section, as outlined above for that record type.

Below the Incident Summary Section there is an additional referral information box, which can be used to record the **Result of Referral** (decline – suspect or decline – fraud) and the **Reasons for Referral** from the selection available by clicking in the relevant box with the mouse. Once decline-suspect or decline-fraud has been selected as the result of referral this cannot be changed.

Pending

If the outcome of the referral has not yet been decided the record can be entered as record type referral only, with a pending result, which means that it can be updated at a later date with either an accept/leave in branch hands, decline-fraud or decline-suspect result. Pending key information should be risk rated blue.

To change the result of a pending referral record, edit the relevant Case Base record. Select the **Amend Result** button, and then select the relevant result. If the result is accept/leave in branch hands no additional data needs to be added to the record. However, if the result is decline-suspect or decline-fraud, a record type should also be selected from the drop down menu and details of the approach filled in on the record.

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If decline-suspect or decline-fraud are selected the risk ratings for key information on the record need to be updated to reflect the seriousness of the incident.

Next Page>>

Once you have entered any relevant information on the record, click on to move onto the next part of the record. The record will now be allocated a unique numerical reference number. The back button (in the top left hand corner of the screen enables you to go backwards to the previous page if required.

D.ii.c) Entering Key Information Data:

Details of suspects &/or innocent third parties and other connected data can be entered at this stage. This can be done either using the quick data entry field or on an individual basis.

Quick Data Entry

If you select the quick data entry field you can enter details of:

- 1 individual name &/or**
- 1 company name, &/or**
- 1 address &/or**
- 1 telephone number &/or**
- 1 account.**

Each piece of data (other than account) **must be risk rated** as this will affect whether the data becomes searchable to manual search users and for automated searches.

Once you have entered all available details in the relevant fields (at least one key piece of data must be entered on a Case Base record, i.e. a name or company or address or phone number or account), click on the **ADD** button to save the data.

Verify Address – This button can be used to compare the data entered onto GKII against UK address data held on GB Address. It enables users to verify that the full address entered on GKII is in fact the correct UK postal address. This cannot be used to verify overseas addresses.

Additional Data

If you have any additional personal names, company/business names, addresses, telephone numbers or accounts to add to the record, you can call up the data entry box by clicking on **Add** with the mouse for the relevant key information data field.

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There are no limits to the number of personal names, company/business names, addresses, telephone numbers or accounts that can be added to a Case Base record. It is important that key information data is entered in the correct fields and risk rated correctly, as this will affect the searching capabilities of the database.

Edit Key Info Data

To amend key information, click on **Edit** next to the relevant piece of key information to be changed. You will then be able to make any amendments necessary.

D.ii.d) Case Notes:

Free text field for additional notes or updates.

D.ii.e) Summary/Assessment:

Free text field for a summary and assessment of the incident where appropriate. Additional reasons for suspicion can be included in this field.

D.ii.f) Conclusion:

Pre drafted conclusions are available for selection, however if none are appropriate please select other and enter a free text conclusion.

D.ii.g) Attachments:

Attachments can be added to a Case Base record which other Case Base users can then access when reading a case file. The attachment can be a word document, an excel file, a page saved from the Internet or a scanned image.

***Key Correspondence/
Attachments***

To add an attachment to a case file click on **Add Item**. This will call up a document data entry box.

Title

Add the relevant document/attachment name for reference purposes.

File Name

Click on **browse** and then double click on the file to be attached from the relevant drive/directory on your PC/network. Once the correct file is selected in the 'file name' field, click on **ADD**.

Scanning Images

Scanned images can be saved as either. jpeg or .gif files and then attached to the record as outlined above.

D.ii.h) Save Record:

To save the record once all the fields have been filled in, simply click on **Save** button at this point.

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**<<Prev Page &
Next Page >>**

Use these buttons to move around the record. Alternatively you can use the forward and back buttons located on the tool bar at the top left hand screen to move around the record. **NB: If you have not reached the end of a record and saved it, you could lose the information entered by using the previous page button.**

D. iii) Editing / Deleting a Case Base Record.

Once you have accessed a record by clicking on the reference number from the Case Base search results, you can edit or delete the record as follows:

Edit this Casefile

To edit the record select Edit this Casefile from the top left of the screen, and make any additions or amendments as necessary. You can move around the record by using the **next page >>** and **<< previous page** buttons. Remember to save the amendments made by going to the end of the record and selecting the Save button.

Record Types

Record types cannot be changed once a record has been created, other than in the following situations: A Fraud Attempt record can become a Fraud Loss record (or vice versa), a Money Laundering Suspicion record can become a Money Laundering Disclosure record or a Referral record can change from pending to either accept or decline.

Incident Summary

To add incident summary information to a record that has already been created, simply add a tick to the relevant box with the mouse. (Where a list has tick boxes for selection, more than one item can be selected. Where a list is drop down menu box, only one item can be selected).

Key Information

Key information can be added by going to the Key Information input page of the record (using the next page >> or << previous page buttons). Click on Add, next to the relevant key information field to add names, addresses, company/business names, telephone numbers or accounts. Click on the Add button at the bottom of the screen to update the record.

Edit Key Information

To amend key information use the edit button next to the relevant piece of key information. Make any changes to the information as required and click on OK.

***Case Notes &
Summary/Assessment***

Additional free text comments can be added to these fields at any time.

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Save

Click on the Save button when any amendments have been completed.

Delete this Casefile

To delete a record select Delete this Casefile. A record can only be deleted by a user from the Control Authority that created the record.

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E. Case Base Analysis

E.i) Statistics

This function allows the user access to statistical information concerning case record data in any given time period.

Date From/To

Enter dates you wish to search between / from / to.

Record Status

Select open / closed / all

Business

Select one business or all.

Record Type

Select one of the record types or all.

Category

Select a category or all. You will only be able to select the category if one business and one record type has been selected.

eCommerce

If you would like to include eCommerce records, click on yes in this field.

Referral

If you would like to obtain statistics concerning referral records, select the relevant referral result from the drop down menu.

Amounts

If Fraud Loss or Fraud Attempt records have been selected – additional criteria can be selected i.e. the potential loss, actual loss, recoveries and net loss by RBS Group, client or third party for those records can be obtained.

Submit Query

Once the date, business area, record type, category (if relevant) and any other criteria have been selected from the menus – click on Submit Query and the database will provide a list of the number of records matching those criteria, and any relevant loss/recovery data.

Money Laundering Suspicion & Disclosure Statistics

Additional statistical data on money laundering suspicion and disclosure records is available.

The records can be broken down by sort code or by department/area to show the numbers of suspicion reports or disclosures made by each sort code or department/area. Statistics relating to the reasons for suspicion used by these areas is also available.

Format for printing

If you need to print the list click on this button and press the print icon on the tool bar at the top of the screen.

E. ii) Pattern Analysis:

Pattern searching provides the user with an analytical tool that can search the total database for matches against pre-selected criteria, and then provide a list of all the records (in list form) which match the data/criteria searched on. It is a tool that can be used to look at

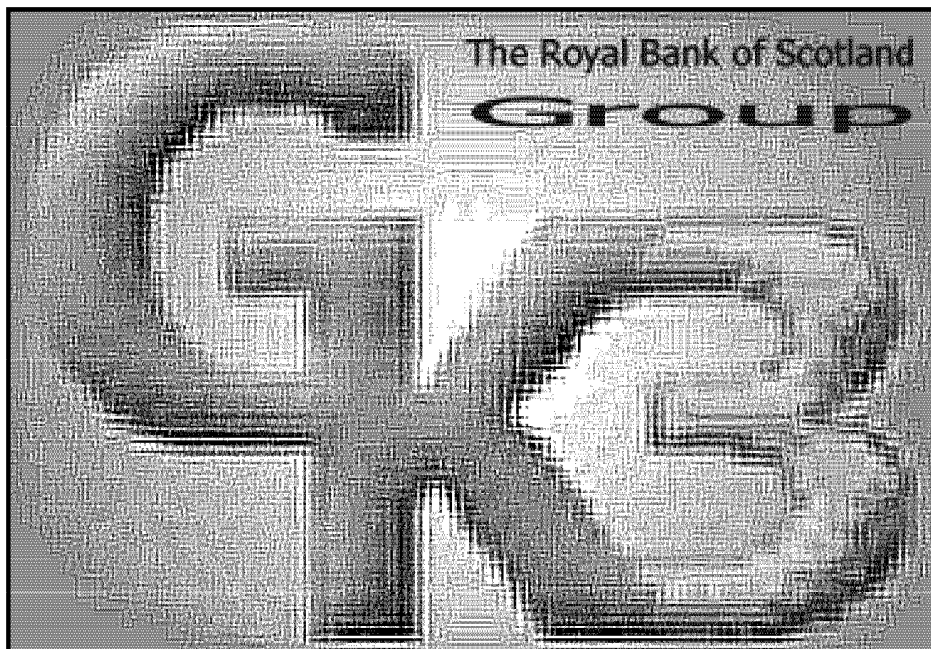
| | |
|----------------------------|---|
| | past or developing trends/patterns using wide or narrow search criteria. |
| Method | Enter details in as many or as few of the fields as necessary to set the search criteria: |
| Date From/To | Enter dates you wish to search between / from / to. |
| Record Status | Select open / closed / all |
| Business | Select one business or all. |
| Record Type | Select one of the record types or all. |
| Category | Select a category or all. You will only be able to select the category if one business and one record type have been selected. |
| Bank Details | Enter details of Sort Code / Account Type / Amounts if relevant to the search. |
| Address Details | Enter details of Street / Town / Postcode / Country if relevant to the search. |
| Subject Details | Enter details of Name (can be first name or surname) / Company Name if relevant to the search. |
| Submit Query | Once the relevant criteria have been set using the above fields, press enter or click on submit query and a list of records will be returned which match all the search criteria specified. |
| Format for printing | If you need to print the list click on this button and press the print icon on the tool bar at the top of the screen. |

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EXHIBIT 54 to Declaration of Joel Israel

GK3 Database



Complex Users Guide

Maintained by Group Financial Crime

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What is GK3 (back)

GK3 is a web-enabled database, which records details linked to various suspected fraud and money laundering incidents across the RBS Group and is the major Group Repository for the following information:

- Money laundering suspicion reports generated internally and those disclosed to the civil authorities
 - Production Orders served on the Group by regulators or other civil authorities
 - Major fraud cases involving either potential/actual losses, or significant reputational exposure. This is primarily sourced from the Non Plastic Fraud Management System (FMS) and is updated on a daily basis.
 - Certain categories of litigation involving the bank
 - Prohibitions placed on the Group by domestic or overseas regulators in relation to specific individuals or corporate entities.
- This is primarily sourced from a copy of the **World Check** database, which details the BoE names, Sanctions & Terrorist names, OFAC and PEPs (Politically Exposed Persons). A daily update feed is received.

User Undertaking (back)

A match on GK3 should be taken to indicate that information is held centrally which may be of relevance to users carrying out due diligence and which may be of assistance in the decision making process. No other inference is implied or intended.

The GK3 database contains confidential material, access to, which is restricted to authorised personnel only. Approved users should not allow any unauthorised bank staff to carry out searches on the database or to view information contained on it. Information contained on the database must not be disseminated to unauthorised third parties.

Data held on GK3 should only be accessed by users in support of their legitimate bank duties.

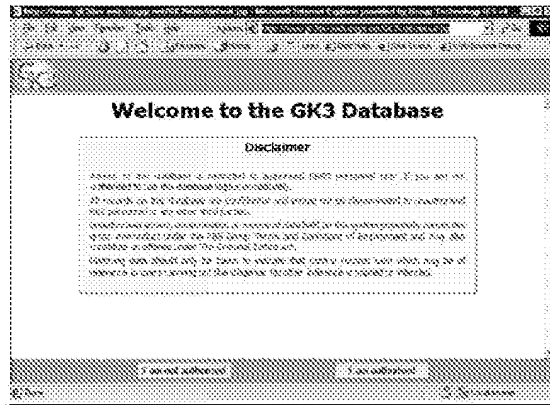
All users using the system are understood to have consented to the above user undertaking.

Disclosure of materials to an unauthorised third party or abuse of data contained on the database may amount to disciplinary action against the user.

Accessing GK3 (back)

Clicking on the link below displays the GK3 Homepage
<https://www.gk3.web.rbsgrp.net>

Users should then click on the "I am Authorised" button to access the system.



GK3 Homepage

SecurID Token (back)

This is used by Complex Users as the second level authentication process for accessing GK3 and viewing Casefiles and effectively replaces the Web Certificates used with the old Goalkeeper system.

- What is a SecurID Token?
- Token Owner Responsibilities
- Obtaining a SecurID Token
- Lost Tokens
- Forgotten PINS

What is a SecurID Token?

A SecurID token is a portable, physical device for strong user authentication, which takes the form of a credit card or key fob. Derived from the world of cryptography, this particular gadget has a small window that displays a series of 6 digits. Every 60 seconds, the display changes to show a different 6-digit number. When a Complex User needs to access GK3, they will be asked to further identify themselves by typing in their secret PIN and the digits displayed on the token device.

Token Owner Responsibilities

If an unauthorised person learns your PIN and obtains your token, this person can assume your identity. Any action this intruder takes is attributed to you in the system's security log trail and you may be held accountable for activities recorded identifying you as the perpetrator. You must avoid the unauthorised use of your identity and privileges by protecting the secrecy of your PIN and the possession of your token.

For your own protection and that of the system, always take the following precautions:

Never reveal your PIN or user password to anyone. Do not write them down.

If you think someone has learned your PIN, notify the help desk, who will clear the PIN immediately. At your next login you will have to receive or create a new PIN.

Exercise care not to lose your SecurID token or to allow it to be stolen. If your token is missing, tell an administrator immediately. The administrator will disable the token so that it is useless to unauthorised users and assign you a temporary password.

Do not let anyone access the system under your identity (that is, log in with your PIN and a tokencode from your SecurID token).

It is essential that you follow your system's standard logoff procedures. Do not leave an active terminal or workstation unattended. Failure to log off properly or invoke a screen saver can create a route into the system that is completely unprotected. Protect your token from physical abuse. Do not immerse it in liquids, do not expose it to extreme temperatures, and do not put it under pressure or bend it. Read and follow the care instructions that come with your SecurID token.

Obtaining a SecurID Token

New Complex Users should access the attached to link to request a SecurID token.
http://www.manufacturing.rbs.co.uk/GTism/forms/remote_access/Secureid_token_request.htm

Please note you may be asked to provide some additional identification by way of personal-type questions....name of first school etc.
The user will receive a SecurID token from Security Operations. The token will be accompanied by a Terms and Conditions sheet, which must be read and user should sign the SecurID token receipt and fax this to Security Operations on the number provided.
Security operations will then activate the token when the user's receipt has been returned and the users identity has been verified.

Lost Tokens

Where a user loses his/her token, the user should immediately send an e-mail to Security Operations (~ ITS Security - Operations) and provide the following information:

- User's Full Name
- RACF Id (i.e. Logon ID)
- Department Name/Full Address
- Telephone Contact Number
- Brief description of problem (i.e. lost token – replacement required)

Security Operations will arrange for a replacement token to be issued. The procedures contained above for new tokens will apply in respect of issuance/activation of tokens.

Forgotten PINS

Where a user has forgotten his/her PIN, the user should immediately send an e-mail to Security Operations (~ Security Operations) and provide the following information:

- User's Full Name
- RACF ID (i.e. Logon ID)
- Department Name/Full Address
- Telephone Contact Number
- Brief description of problem (i.e. lost token – replacement required)

Security Operations aim to process requests for SecurID tokens within 2-3 working days.

All requests directed to Security Operations are subject to these turnaround times but priority will be given where possible to requests for lost/forgotten tokens or for PIN resets.

If a request is of an urgent nature, send an e-mail to Security Operations (as outlined in the procedures within this document) and then follow-up with a telephone call to Security Operations.

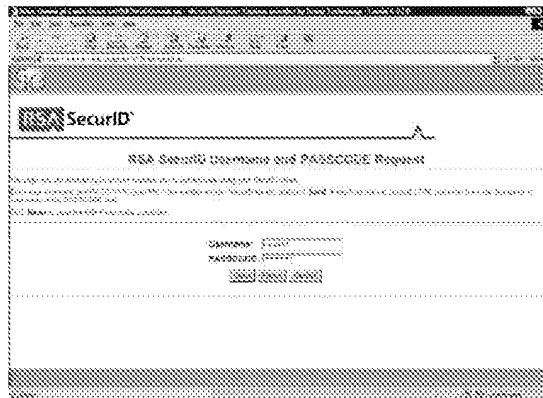
Using your Token for the first time

Users accessing the system for the first time will need to enter the 6-digit number from the token into the PASSCODE field. They will then be prompted to create a 4 digit PIN.

Further attempts to access the system will need both the PIN code and the 6-digit entered into the PASSCODE field.

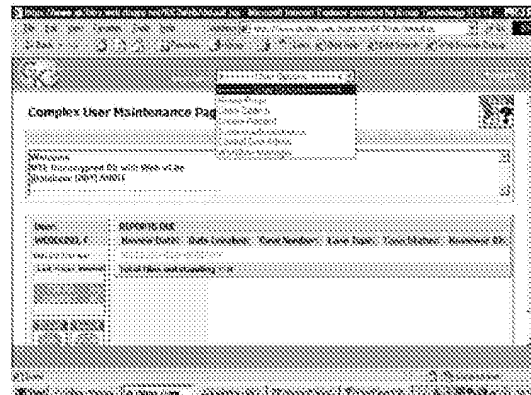
The RSA SecurID screen will look like this.

Please note the username should contain your logon credentials only (typically your RACF) - any other details like domain should be removed before clicking on the "Send" button.



Complex User Homepage (back)

This is the page that all Complex Users will see once logged onto GK3.



Broadcast Messages

This is a useful means for advising/informing Complex Users of impending system maintenance work or specific issues/availability of new Fraud Warning Notices and new Sanctions & Terrorist Lists or any similar related issues that need to be made available/known to GK3 Users.

Message creation and maintenance is managed by Group Financial Crime.

Last Cases Viewed

This provides the user with a chronological (most recent at the top) list of the last 10 cases they have viewed. Clicking on the case-link will access the casefile.

Diary Button

Clicking this button opens the User's Case Diary and displays all allocated cases in date order with the oldest case at the top. Cases annotated in red are overdue. Cases can be accessed by clicking in the yellow area when the mouse is pointed at a case.

Amend Button

Clicking this button allows the user to change their telephone contact number. It is worth noting that this number will appear on cases created by the user. Users will need to enter their numbers in the "Enter New Phone Number" field and click on the OK button for the changes to become effective.

Reports Due

Essentially a case 'In-tray' for the current day. Cases are displayed with overdue cases annotated in red and can be accessed by clicking in the yellow area when the mouse is pointed at a case.

Navigation

Users navigate in GK3 by either clicking the drop-down arrow or anywhere inside the "User Options" list box in the header/banner, as shown in the Complex User Homepage screenshot above.

Complex Users will be provided with the following options:



- Homepage
- Case Search
- Create Record

Case Search (back)

The screenshot displays the 'Case File Search' interface within a Microsoft Internet Explorer browser. The address bar shows the URL: <https://www.gk3.web.bsgp.net/GK3Web/default.jsp>. The page features a header with the 'GK3' logo and a 'User Options' dropdown menu. The main content area is titled 'Case File Search' and contains a grid of input fields for various identifiers and personal details. The fields are organized as follows:

- Case Reference:
- NCTIS Ref no.:
- Previous System Ref no.:
- Surname:
- Forenames:
- Date of Birth (dd/mm/yyyy):
- Customer ID no. (CIN):
- Company/Business Name:
- Company Ref no.:
- House Name:
- House no.:
- Street Name:
- Town:
- Country / Region / State:
- Post Code / Zip Code:
- Country:
- Telephone/Fax no.:
- Account no.:
- Sort Code:
- Passport no.:
- National ins no.:
- Driving Licence no.:
- Occupation:
- Employer's Postcode:
- Website:
- IP Address:
- Email Address:

At the bottom of the form are two buttons: 'Search' and 'Clear'. A small note below the form states: 'NB. By default 1000 rows will be returned. To return all rows check this box'.

The Case File Search screen allows Complex Users to search any key information relating to current business applications (including referrals from Standard Users), approaches or proposals to find out if anything has been previously recorded on the Goalkeeper database. Users can directly access case details by clicking on the Case Reference Number link on the far right hand-side of the resultset. Please note: Exact Matches are now annotated with a red tick  and Possible/Close Matches with a black question mark .

The following searches can be undertaken:

- Reference Number Searches
- Name Searches - Individuals
- Date of Birth Searches
- Customer ID Number (CIN) Searches

- Company / Business Name Searches
- Address Searches
- Telephone/Fax Number Search
- Account Number Search
- Other Personal Data Search
- Miscellaneous Data Search

Reference Number Searches (back)

Case Reference Number (Exact Matches Only)

If you already know the Case Reference number of the record that you are looking for, enter it in the reference number search field and click on/press enter. The Case Reference number will come up on the screen. The record can be accessed by clicking over the reference number with the mouse (subject to individual and/or Business permissions). You will then be able to read or edit the file as required.

SOCA Reference Number (Exact Matches Only)

If you already know the SOCA Reference number associated with the record that you are looking for, enter and search in the SOCA Reference field.

Previous System Reference Number (Exact Matches Only)

Previous or other reference numbers can be searched using the Previous Reference Number search field, e.g. Z77865.

Name Searches - Individuals (back)

Searching a Name

When searching a name enter the surname, as it appears, in the surname field and the first name, if you have it, in the first name field and press enter or click on search with the mouse.

It is not possible to search for first name(s) only, but you can carry out a search with only a surname entered

By default 1000 rows will be returned for the search criteria entered - this is essentially to speed up search times and present the user with the most appropriate resultset. To return all results, useful for common names, select the Return All box.

Please note, selecting the "Return All" option will impact the time taken to return the results.

The results shown above, shows a new column called Key Info (Key Information Type) and is used to differentiate what connection each individual is in the case, i.e. Main Party, Spouse etc.)
Later GK phases will look to link all pieces of data to an individual/Company.

Exact Matches ⁴

An exact match will be returned where the details entered in both the surname and the first name fields are exactly the same as those of data held on the GK3 database. Exact matches will appear at the top of the list of matches .

Possible Matches ?

Any other possible matches will be listed alphabetically below exact matches.
Possible matches are created by the sounds like & contains facility (see below).

Sounds Like & Contains

A surname search looks for an exact match on the surname entered, but will also look for sounds like and contains matches using that surname. For example, a search of the surname Smith would call up all records where the surname recorded is Smith, but would also call up records containing, or which sound like Smith, i.e. Arrowsmith, Goldsmith or Smythe.

Possible matches are listed according to a match on the surname searched, followed by all sounds like and contains options in alphabetical order.

It is always advisable to scroll through the possible matches to look for close matches, where the name may have been misspelled or misrepresented in some way.

Date of Birth Searches (back)

DOB Search (Exact Matches Only)

If you wish to search for a particular date of birth only (i.e. not associated with a particular name) enter details in the Date of Birth search field – e.g. 01 May 1970.

Name & DOB Search:

If you search a name and a date of birth at the same time, the system will look for an exact match on the name with the date of birth entered.

This search will not return any other matches where the date of birth entered appears on the database in connection with a different name. In order to search for any records on which a particular date of birth appears, carry out the above DOB only search

Customer ID Number (CIN) Searches (back)

Enter details of the Customer ID Number you wish to search in this field - e.g. 1234567890 (Exact Matches Only).

Company / Business Name Searches (back)

Searching a Name

When searching for a company or business name, you can enter the name in the company/business name search field and any exact or possible matches will then be listed. Exact matches are listed at the top of the result list and possible matches are sorted alphabetically below exact matches. See Name Searches above for further details of exact, possible and sounds like / contains matches.

Company Reference Number Search (Exact Match Only)

A search of company reference numbers (i.e. the registration number in the country of incorporation) is also possible, however if a search of a company reference number results in no matches, a company name search, as described above, is recommended.

Please note 1000 rows will be returned for this search type - unless Exact Match only

Address Searches (back)

There are a number of ways of searching for an address on the database. The relevant fields available for searching are:

House Name Search

A search of a house name can be carried out by entering the relevant details in the house name field only, in which case no other element of the address would be searched in this instance.

A match will be returned where the data entered matches a house name on the system or where the contains/sounds like facility has picked up data, which contains elements of the house name entered.

Possible matches are sorted alphabetically by postcode where one is available.

House Name & Street Name Search

Where you have a house name and street name, details can be entered into the relevant search fields.

An exact match would be returned where both the house name and street name are recorded on an address contained on the key information database.

Possible matches would be returned where the contains/sounds like facility has picked up data containing the house name or street name. These matches are sorted alphabetically by postcode.

House Number & Street Name Search

*****It is not possible to search for House Number only*****

Where you have a house number and street name, details can be entered into the relevant search fields.

An exact match would be returned where both the street number and street name are contained on a record on the key information database.

Possible matches would be returned where the contains/sounds like facility has picked up data containing elements of the street name searched on but not the house number. These matches are sorted alphabetically by postcode where one is available.

Street Name Search

A search of the street name only would return an exact match if the street name as entered was found, and possible matches where that street name appears on, or is contained in, records on the key information database. These matches are sorted alphabetically by postcode where one is available.

Town Search (Exact Match Only)

Enter details of the name of the Town you wish to search in this field - e.g. Farnborough.

County/Region/State Search

Enter details of the name of the County/Region/State you wish to search in this field - e.g. Warwickshire.

Exact matches are returned first based on search input and then possible matches are returned using Wildcard functionality.

Postcode Search

A search of a postcode only would return exact or possible matches where that postcode appears on or is contained in records on the key information database. By searching part of a postcode e.g. SE3 only, all postcodes containing SE3 would be returned as possible matches. Zip codes & foreign postcodes can be searched using the postcode search field.

Postcode & House Name/Number Search

A search of a postcode and house number or name would return exact matches where both house number/name and postcode are contained on a record on the database. Possible matches would be returned where there are matches on the postcode only. All possible address matches are listed alphabetically according to the postcode.

Country Search (Exact Match Only)

Select the Country you wish to search against from the drop-down list only - e.g. United Kingdom.

****Please note 500 rows will be returned for this search type - unless Exact Match only****

Telephone/Fax Number Search (back)

Enter the telephone number in the telephone/fax number search field. This search is not space sensitive, so the number can be entered with or without spaces. The last 6 digits only of the number entered are searched – this avoids confusion over representations of foreign dialling codes and changing area codes when searching. Any telephone number on the database, which contains the last 6 digits of the number searched, will be returned as a possible match.

****Please note 500 rows will be returned for this search type****

Account Number Search (back)

Account Number Search

A search of an account number can be carried out by entering the relevant details in the account number field - e.g. 97276543.

A match will be returned where the data entered matches an account number on the system or where the contains/sounds like facility has picked up data which contains elements of the house name entered.

Possible matches are sorted alphabetically by postcode where one is available.

Sort Code Search (Exact Match Only)

Enter details of the Sort Code you wish to search in this field - e.g. 600236.

Account Number and Sort Code Search

Where you have both an account number and sortcode, details can be entered into the relevant search fields.

An exact match would be returned where both the account number and sortcode are recorded on the database.

Possible matches would be returned where the contains/sounds like facility has picked up data containing the account number, like 87564329 and 140 87564329.

Please note 500 rows will be returned for this search type - unless Exact Match only

Other Personal Data Search (back)

Passport Number Search (Exact Match Only)

Enter details of the Passport Number you wish to search in this field - e.g. 0897345C.

National Insurance Number Search (Exact Match Only)

Enter details of the National Insurance Number you wish to search in this field - e.g. TN080956M.

Driving Licence Number Search (Exact Match Only)

Enter details of the Driving Licence Number you wish to search in this field.

Occupation Search (Exact Match Only)

Enter details of the Occupation you wish to search in this field - e.g. Plumber.

Employer's Postcode Search

A search of an Employer's Postcode will return both exact or possible matches where that postcode appears on or is contained in data records.

By searching part of a postcode e.g. TN6 only, all postcodes containing TN6 would be returned as possible matches. Zip codes & foreign postcodes can be searched using the Employer's Postcode search field, where information is available.

Please note 500 rows will be returned for this search type - unless Exact Match only

Miscellaneous Data Search (back)

Website Address Search

Enter details of the Website Address you wish to search in this field - e.g. google.
Exact Matches are returned followed by possible matches based on contains functionality like mygoogle and googlemaster.

IP Address Search (Exact Match Only)

Enter details of the IP Address you wish to search in this field - e.g. 11.134.100.40

E-Mail Address Search (Exact Match Only)

Enter details of the E-Mail Address you wish to search in this field - e.g. joe.bloggs@rbs.co.uk.

Please note 500 rows will be returned for this search type - unless Exact Match only

The results are displayed in the following tabulated format:

The screenshot shows a web application interface for search results. At the top, there is a 'Search Information' section with fields for 'Search Name' and 'Search Date'. Below this is a 'Search Results' section containing a table. The table has the following columns: Match, Surname, Forename, Key Info, Sex, DOB, Case Type, and Case Ref. The table contains several rows of data, including names like 'HAGGINS', 'HAGGINS', 'HAGGINS', 'HAGGINS', 'HAGGINS', 'HAGGINS', 'HAGGINS', and 'HAGGINS'.

The results shown above, shows a new column called Key Info (Key Information Type) and is used to differentiate what connection each individual is in the case, i.e. Main Party, Spouse etc.) Refer to the GK3 InfoTab for a full data list. Later GK phases will look to link all pieces of data associated with an individual or Company.

Users will now be aware what type of case they are looking at, due to the case type indicator, however due to available space in the results table, this has had to be abbreviated to two letters, as per the legend below:

| Abbreviation | Description |
|--------------|---------------------------------|
| ED | External Data |
| FA | Fraud Attempt |
| FL | Fraud Loss |
| IM | Money Laundering Suspicion |
| LP | Legal Process Order |
| NO | Referral Only |
| SA | Intelligence & Suspect Approach |
| ST | Sanctions & Terrorist Financing |
| WP | Money Laundering Disclosure |

Matches (back)

Typically screening for a match on GK3 will require two searches:
 Individual name (Surname or Surname + forenames) with date of birth / or
 Company/Business name
 and
 Address (+ telephone number if available)

Where GK3 returns information that confirms the match with absolute or near certainty the position is straightforward - these matches should be referred to your referral point. However in many cases names/dates of birth/addresses will be incomplete and therefore a positive identification will not be possible.

In these cases it is necessary to determine at what level the initial searches are deemed to constitute a match for the purpose of then undertaking a more detailed analysis of GK3 data via the referral point.

The main practical problem is how to treat the large number of potential matches thrown up by the initial search on common individual names. The following principles should therefore be adopted when searching individual names:

Treat as a match where the initial search on individual name returns:

Match on surname and initial (or better) plus date of birth (DOB)

Match on surname and 2 full forenames

Address information, either via name search (View Address icon) or individual address search may enable false matches to be eliminated where there are close matches on common name

(s) or loose match on distinctive name(s). For example - If you find an address match with the same case reference number as that of the common name / loose name match you should refer the details

Disregard any results where the initial search on name returns only loose matches on common names

Find below some examples of these rules in action:

Common Name - John Percival Smith, DOB - 5.6.78 of 5 Beechwood Road, PE13 5HR.

The following would constitute individual name matches:

- J Smith 5.6.78
- John Percival Smith
- John P Smith - but then disregard if no address match
- John Smith - but then disregard if no address match

The following would not be matches:

- J Smith
- P Smith
- Smith
- John Smith (with no DOB or address match)

GK3 returns indicating minor discrepancies , which maybe treated as matches, e.g.

John Percival Smith DOB 6.5.78

J P Smith DOB 6.5.78 (even if there is no address match)

Less Common Name - Giles David Mainwaring

The following would constitute individual name matches:

Giles D Wainwaring or Giles Mainwaring

G Mainwaring - would be a potential match, however could be disregarded if no address match with the same case reference number were found.

GK3 returns indicating minor discrepancies can be treated as matches, e.g.

Giles David Mainwareing

Company Name Matches

When searching company names similar rules can be applied. For example when searching the company name Tajill Limited, the following might be considered as matches for referral, as the company name is fairly uncommon and they may form a Group of companies all with Tajill in the name:

- Tajill Ltd
- Tajill (Iran) Ltd
- Tajill UK Ltd

Returns with a minor discrepancy such as Tajil Ltd could also be considered to be a match.

Where the company name contains more common elements, for example International Financial Advisors Ltd, the following examples could be considered to be matches:

- International Financial Advisors
- International Financial Advisors (Ltd)
- International Financial Advisors Co Ltd

Whereas the following could be considered not to be matches:

- International Finance Ltd
- International Advisors (Ltd)

Again, always search the company/business address as well - an address match with the same case reference number as a potential company name match could indicate that you have a company name match that should be referred.

Address Searching

Address searching is more straightforward. When searching a UK address the full postcode along with the house number or name can be used to locate exact matches. Searching foreign addresses is best undertaken by using the number / house name and street name to locate any potential address matches.

Only exact matches on an address would need to be referred. For example, if searching - 13 High Street N1 8PB, a match on all elements of the address should be referred. If a postcode search returned a result of 15 High Street N1 8PB this is not a match. However 13-15 High Street N1 8PB should be considered a match.

The above are guidelines only and some personal judgement must be exercised. At the initial searching stage it is preferable to err on the side of caution and further investigate potential matches. Referring to the Complex User will determine whether there is a true match and if so whether to accept or decline business.

Create Record (back)

It's perhaps helpful at this point to review the contents of a typical GK3 record.

| Case Summary | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---------------------|------------------------------------|---------------|------------------------------------|--------------------------|--|--------|--|------|--------------------------|--|-------------------|---------------------|----|--|--|--|-------------|--|--------------|---|--|--|-------------------------|---|----|---------------|--|--|------------|-------------------|----|--|--|--|------------------|--|--|--|--|--|
| <div> <input type="button" value="Update Case"/> <input type="button" value="Money laundering disclosure"/> </div> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <div> <input type="button" value="Case Summary"/> <input type="button" value="Personal Data"/> <input type="button" value="Subject Data"/> <input type="button" value="Notes & Case Links"/> <input type="button" value="New Contact"/> </div> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| <table border="1"> <tr> <td colspan="2">Incident Data</td> <td colspan="2">Status</td> <td>Open</td> <td>Source: [RMSGK2:2169515]</td> <td rowspan="5"> <div> <input type="button" value="Linked Cases"/> <input type="button" value="None"/> <input type="button" value="Maintain Links"/> </div> </td> </tr> <tr> <td>Control Authority</td> <td>NatWest Retail Bank</td> <td>by</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Review Date</td> <td></td> <td>High Profile</td> <td>N</td> <td></td> <td></td> </tr> <tr> <td>Remote Delivery Channel</td> <td>N</td> <td>by</td> <td>EUROPA Popabo</td> <td></td> <td></td> </tr> <tr> <td>Created on</td> <td>20 Jul 2004 00:00</td> <td>by</td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="2">Last Modified on</td> <td colspan="4"></td> </tr> </table> | | | | | Incident Data | | Status | | Open | Source: [RMSGK2:2169515] | <div> <input type="button" value="Linked Cases"/> <input type="button" value="None"/> <input type="button" value="Maintain Links"/> </div> | Control Authority | NatWest Retail Bank | by | | | | Review Date | | High Profile | N | | | Remote Delivery Channel | N | by | EUROPA Popabo | | | Created on | 20 Jul 2004 00:00 | by | | | | Last Modified on | | | | | |
| Incident Data | | Status | | Open | Source: [RMSGK2:2169515] | <div> <input type="button" value="Linked Cases"/> <input type="button" value="None"/> <input type="button" value="Maintain Links"/> </div> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Control Authority | NatWest Retail Bank | by | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Review Date | | High Profile | N | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Remote Delivery Channel | N | by | EUROPA Popabo | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Created on | 20 Jul 2004 00:00 | by | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Last Modified on | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Queries | Refer To | Tel No. | Business | Unable to contact ? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | NONE | <input type="button" value="Yes"/> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Money laundering disclosure Record | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Branch | | Submitted By | | GFC | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Unit Sortcode | | Contact No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Submitting Department | | Legislation | | Other | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated Laundering Total | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Reason(s) for Suspicion | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Drawing Against Uncleared | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Transactions GBP: 8000.00 | | <input type="button" value="Add"/> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

| Date | Type | Amount | Currency | |
|-------------|---------------|---------|---------------|------|
| 25 Jun 2004 | Cheque Credit | 1600.00 | British Pound | Edit |
| 28 Jun 2004 | Cheque Credit | 3600.00 | British Pound | Edit |

Set All Risk Ratings to the the same value of:

| Personal Data | | | | | | | Add |
|---------------|-----------|---------------|-----|-----------------|--|--------------------------------------|------|
| Surname | Forenames | Date Of Birth | Sex | Key Information | Risk | Adj | |
| HALL | R O | | M | NONE | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | Edit |
| HUGHES | A | | | NONE | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | Edit |
| WILLIAMS | BARRY | 30 Jan 1977 | M | NONE | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | Edit |

| Business Data | | | | | | | Add |
|---------------|--|--|--|--|--|--|-----|
| None | | | | | | | |

| Telephone Data | | | | | | | Add |
|----------------|------------|-------|--|--------------------------------------|--|------|-----|
| Phone No. | Owner | Type | Risk | Adj | | | |
| 01134721010 | B WILLIAMS | Other | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | | Edit | |
| 01132758504 | B WILLIAMS | Other | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | | Edit | |

| Address Data | | | | | | | Add |
|-----------------|-----------------|-------|----------|--|--------------------------------------|------|-----|
| Bldg No. & Name | Street | Town | Postcode | Risk | Adj | | |
| 13 | BROOMFIELD CRES | LEEDS | LS6 3DD | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | Edit | |

| Account Data | | | | | | | Add |
|---------------|-------------|----------|--------------------|---------------|--|--------------------------------------|-----|
| Account Name | Account No. | Sortcode | Account Type | Currency | Risk | Adj | |
| MR B WILLIAMS | 76545471 | 55-70-23 | Current (Personal) | British Pound | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | |
| R O HALL | 20334871 | 20-25-69 | Current (Personal) | British Pound | <input type="button" value="Low"/> <input type="button" value="Medium"/> <input type="button" value="High"/> | <input type="button" value="Reset"/> | |

| Miscellaneous Data | | | | | | | Add |
|--------------------|--|--|--|--|--|--|-----|
| None | | | | | | | |

| Case Notes | | | | | Add |
|------------------------|-------------|----------|---|--|------|
| Type | Date | User | Text | | |
| Summary and Assessment | 20 Jul 2004 | Migrated | The misuse/abuse of account number 76545471 sortcode 55-70- | | View |

| Key Correspondence | | Add |
|---------------------------------|--|-----|
| No Documents have been uploaded | | |

| NCIS Disclosures | | Author | Date |
|---------------------------|--|---------------|-------------|
| NCIS Disclosure 421311590 | | EUROPA/Pccasp | 20 Jul 2004 |

Summary

Contents of a GK3 Case Summary Record

A brief summary of the incident and other relevant details is recorded on each Case Summary record.

Case Record

Numerical case reference number is automatically generated by the database and is located in the application header and is therefore always viewable.

New cases on GK3 will start from 1000000.

Case Record Types

The Case Record Type is shown at the top and middle of the Case Summary record. There are 9 types of Case Summary records, which are used to record details of the following types of incident:

- **Fraud Loss (FL)** - This record type is used to record the details of incidents where a fraud loss to either the RBS Group, a client or third party has occurred. A loss amount must be entered in order to create a Fraud Loss record.
- **Fraud Attempt (FA)** - This record type is used to record the details of incidents where there has been an attempt to defraud either the RBS Group, a client or a

- third party, however no money was actually lost. A potential loss amount must be entered in order to create a Fraud Attempt record.
- **Intelligence & Suspect Approach (SA)** - This record type is used to record details of incidents where an approach has been made to the RBS Group which has caused concern, however there has been no actual or potential fraud loss.
 - **Money Laundering Suspicion (IM)** - This record type is used to record details of money laundering suspicions across the RBS Group.
 - **Money Laundering Disclosure (WP)** - A Money Laundering Disclosure record indicates that a financial disclosure has been made to the relevant authorities.
 - **Legal Process Record (LP)** - There are 4 types of Legal Process record: Notice of Intent, Production Order or Equivalent and Customer Disclosure Authority.
 - Notice of Intent: This category is used where we receive notification from the authorities that a production order, or its equivalent, is going to be served in respect of a particular customer.
 - Production Order or Equivalent: This category is used to record details of legal orders served in respect of RBS Group customers.
 - Customer Disclosure Authority: This category is used to record details of customer disclosure authorities received by the RBS Group.
 - Social Security Fraud Act: This category is used to record details of requests received under the Act by the RBS Group.
 - **External Data (ED)** - This record type is used to record external information, which is in the public domain, for example details of regulatory actions, press information etc.
 - ! Imported World Check records will be categorised as External Data cases.
 - **Referral Only Records (NO)** – This record type is used to indicate records on the database that are the result of any internal referral process.
 - **Sanctions & Terrorist Financing (ST)** - This record type is used to record details of Sanctions & Terrorist data, as defined by Group Enterprise Risk and provided by World Check.
 - **General Intelligence (IT)** - This record type has been used to record details of old Fraud Office intelligence files and cannot be selected to create a new Case record.

Incident Data Block

Control Authority

This field shows the 'owner' of the record, i.e. business area involved in a particular incident, such as RBS Retail Bank.

Please refer to the GK3 InfoTab for a full list of Control authorities.

Status

A case record can be open, closed, recommended or approved for disclosure to the Financial Authorities and allocated to a user pending receipt of further information.

See later in creating a record and the GK3 InfoTab.

Source

When available will advise former reference numbers and systems. In the screenshot above the reference is **FMSGK2:Z169515**.

This shows that the original system source was Fraud Management System (**FMS**) and migrated from the previous Goalkeeper system **GK2**. The FMS reference number was **Z169515**.

Review Date (by)

Details of the user who created or modified the record and the relevant dates will be recorded in these fields.

Remote Delivery Channel

This field indicates whether the record is linked to one of the Group's Remote Delivery Channels, i.e. On-Line Banking.

High Profile

This field indicates whether the record is a high profile case and is determined by criteria defined and maintained by Group Financial Crime. It is not expected that other Businesses would set this marker. Criteria may include estimated amount laundered, number of disclosures to the Financial Authorities during a specific period and the nature of trading activity.

Created/Modified by & on

Details of the user who created or modified the record and the relevant dates will be recorded in these fields.

User details are recorded on GK3 in the format "DOMAIN__RACF or Logon, i.e. RBS__bloggsj

Linked Cases Block

Linked Cases

This provides the reference number and reason for any linked cases.

Cases will be linked automatically by an overnight process that will link cases where certain data are the same. These might include:

- Surname and Date of Birth
- Account Number and Sort Code
- Telephone Number

Whilst this process will identify the link there may be occasions where cases need to be linked for other business related reasons, this can be achieved by manual linking cases.

Cases that have been auto-linked will be annotated with the suffix (auto), i.e. Personal (auto). This would indicate that the cases are linked due to personal information, such as surname and date of birth.

Please refer to the GK3 InfoTab for a complete list of linking reasons.

Queries Block

The Queries Block provides information on where users can refer if they require further information etc. Typically, this would be the user who created the case originally or a user who has made significant modifications.

Refer To

Users name.

Tel No.

The User's telephone number. Please note this is taken from GK3 User Table, which comes from the user's homepage details.

Business

The User's Business, i.e. Coutts & Co.

Unable to contact?

This is a link to a Helppage that will provide a single point of contact for the Business, who maybe able to assist or provide an alternative contact point. This maybe caused by a user leaving or moving premises and/or telephone.

Case Type Record Block

Different fields will be displayed here based on the record type, these will include:

- Reason(s) for suspicion.
- Submitting Branch/Sortcode details.
- Financials.
- Information Source.
- Legislation.

Transactions Block (Money Laundering case types only)

This displays details of transactions relating to the case, including:

- Transaction Date.
- Transaction Type.
- Transaction Amount.
- Transaction Currency.
- Sterling Amount - This is viewed by clicking on the "Edit" button on the right-hand side.

Risk Ratings (back)

Risk Ratings

All individual names, company/business names, addresses, telephone, account and miscellaneous data entered onto GK3 is allocated a risk rating.

| Risk Ratings | Description |
|--------------|-----------------------------------|
| Blue | Innocent |
| Green | Claims/appears innocent. |
| Indigo | Misrepresented. |
| Amber | Suspicious but not proved. |
| Red | Firm evidence of wrongdoing. |

Adjusted Risk Ratings

Overnight the database runs a process that looks at all the key information data and searches for any exact matches, according to a set of rules, where the risk ratings differ. Once any exact matches are found, the process will compare risk ratings, and make any adjustments necessary, examples are as follows:

- 2 green ratings would be adjusted to amber,
- 3 green ratings would be adjusted to red,
- 2 amber ratings would be adjusted to red,

2 red ratings – no change,

A green & amber rating for the same key information would be adjusted to reflect the higher rating of amber,

An amber and a red rating for the same key information would be adjusted to reflect the higher rating of red.

The adjusted risk rating appears in a separate column on Case Base records.

Set All Risk Ratings

Clicking on any of the Risk Rating buttons in this section will set all case data to the same value. This will be useful for future editing purposes.

Personal Data Block

This displays details of individuals recorded on the case and includes:

- Surname
- Forenames
- Date of Birth
- Sex
- Key Information
- Risk Rating
- Adjusted Risk Rating

Clicking on the "Edit" button reveals additional personal data, like:

- Customer ID Number (CIN)
- Nationality
- Town/City of Birth
- Country of Birth
- Occupation
- Employer's Postcode
- National Insurance No.
- Passport No.
- Driving Licence No.

Business Data Block

This displays Business/Company details recorded on the case, including:

- Business/Organisation Name
- Company Reference No.
- Legal Jurisdiction (Country)
- Key Information
- Risk Rating
- Adjusted Risk Rating

Clicking on the "Edit" button reveals additional personal data, like:

- Business Type
- Business Status
- Customer ID Number (CIN)

Telephone Data Block

This displays telephone details recorded on the case, including:

- Phone No.
- Owner
- Type
- Risk Rating
- Adjusted Risk Rating

Address Data Block

This displays address/location details recorded on the case, including:

- Building No. & Name
- Street
- Town
- Postcode
- Risk Rating
- Adjusted Risk Rating

Clicking on the "Edit" button reveals additional personal data, like:

- County
- Country
- Occupier

Account Data Block

This displays account details recorded on the case, including:

- Account Name
- Account No.
- Sortcode
- Account Type
- Currency
- Risk Rating
- Adjusted Risk Rating

Miscellaneous Data Block

This displays miscellaneous details recorded on the case, including:

- Type (E-Mail Address etc.)
- Details, i.e. e-mail address.
- Risk Rating
- Adjusted Risk Rating

Case Notes Block

Case Notes

This field is used for any internal case notes and updates.

Summary / Assessment

This field is used to record additional factual details about the incident and an assessment of the situation.

Conclusion

Records will have a conclusion for the incident recorded. These can either be a pre-scripted or free text conclusions.

Click on the **"View"** button to see the full text output.

Key Correspondence Block

Key Correspondence

Any attachments, such as word documents, letters, application forms, suspicion reports, receipts, copies of a disclosure to SOCA or an internet page etc, will be listed in the 'Key Correspondence' section. Clicking on the View button will open the attachment in a new browser window.

Case Navigation

Navigation between the screens is by way of the buttons located in the footer part of the page (Navigation Footer) or alternatively by using the tabs at the top of the case summary (Record Data, Subject Data etc.)

Delete Case

Deleting a GK3 case can only be completed by an Authorised Complex User.

Creating a Case Record (back)

Go to the navigation menu and select Create Record.
This will call up the New Case screen.

Control Authority

Indicates the owning business area. This field will default to the relevant control authority according to the logon credentials of the user.

Record Type

Select the relevant record type from the drop down menu according to the type of incident to be recorded. Only one can be selected. Users will not be able to select certain Record Types.

Remote Delivery Channel

If a record is related to a Remote Delivery Channel in some way, yes can be selected from this drop down menu.

High Profile

If the record is a high profile case, select yes. This should only be used by Group Financial Crime.

Created/Modified by & on

Details of the user who created or modified the record and the relevant dates will be recorded in these fields.

Status

Status will automatically default to open.

When using the Allocated Status the fields "Review Date" and "By Reviewer" will need to be completed. This will then show in the users case diary on the user's homepage.

Closed status is self-explanatory.

Disclosure Recommended and Approved relate to the status of an SOCA disclosure.

Previous System

Details of the previous system should be entered. Typically, this will only be used by the automated importing processes like World Check.

Previous Reference No.

Any relevant additional reference numbers can be recorded in this field.

Basic Data Screen

Incident Data Screen

Click Next to move to the Incident Data Screen.

Summary of Incident:

The fields to be completed in this section will differ depending on which record type has been selected. An outline of each record type and the relevant fields to be completed is as follows:

****Please note GK3 has a number of validation rules to ensure data integrity. If an option is not selected then an error is displayed. Click OK to continue and then select the relevant option-choice****

Fraud Loss Record

In order to create a Fraud Loss record a loss must be entered in the 'Actual Loss' field.

Loss by

Select either RBS Group, Client or 3rd Party from the drop down menu. Only one can be selected.

Potential Loss

Enter potential loss if relevant.

Paid Away Amount

This section must be completed for a Fraud Loss record. If no actual loss is entered the record will change to a Fraud Attempt record

Recovered Funds

Any funds recovered can be entered in this field.

Net Loss

The net loss is automatically calculated from the above loss fields.

Summary

The summary provides a brief description of the incident. Select the summary(ies) that most closely describe the type of fraud concerned by clicking in the relevant box (a tick will appear in those selected). If none are relevant, select other and complete a brief description of the fraud in the free text case notes or summary field, available later in the record.

Fraud Attempt Record

In order to create a Fraud Attempt record the 'Potential Loss' field must be completed.

Please note Fraud Attempt Cases can now be changed to Fraud Loss Cases by entering details into the "Paid Away Amount" field.

Attempt Against

Select either RBS Group, Client or 3rd Party from the drop down menu. Only one can be selected.

Potential Loss

Fill in the amount in the potential loss field.

Summary

The summary provides a brief description of the incident. Select the summary/ies that most closely describe the type of fraud concerned by clicking in the box (a tick will appear by those selected). If none are relevant, select other and complete a brief description of the fraud in the free text summary field, available later in the record.

Intelligence & Suspect Approach Record

Approach to

Select from RBS Group, Client or 3rd Party.

Reason for Concern

Select any relevant reasons for concern from the list available – more than one can be selected.

Money Laundering Suspicion Record:

Business Units that usually submit suspicion reports to Group Financial Crime should continue to do so, for inclusion on the database.

Submitting Department

This field records which area/unit within the broader business area has submitted the money laundering suspicion report. Select from a drop down menu of areas/units.

This section must be completed where no sort code is filled in.

Submitting Branch / Area

Free text field to record details of the branch or business area submitting the suspicion report.

Submitting Unit Sort Code

Enter relevant sort code from drop-down list, these will be dependent upon Control Authority selected. **This section must be completed where no Department (below) has been selected.**

Submitted By

Free text field to record the contact name of the individual submitting the report.

Contact Number

Free text field in which to record a contact number for the above.

Legislation

Users must select the relevant legislation from the drop down menu.

Currency

Users must select the relevant currency from the drop-down menu.

Estimated Amount Laundered

Enter amount based on the knowledge of the case and transactions, if known.

Reason(s) for Suspicion

One or more of the reasons for suspicion can be selected from this list by clicking in the relevant box (a tick will appear by those selected). This section is designed to provide a brief overview – if none of the reasons are relevant, select other and fill in the free text summary later in the record.

Transactions

When entering a money-laundering suspicion record a transaction box will be available with the transaction information entry fields. The transaction section can be used to record details of suspicious transactions. Select **ADD** on the right hand side of the Transaction Data Block. These transactions can be used to form part of the disclosure information if required.

Money Laundering Disclosure Record

A money laundering disclosure record is created when a money laundering suspicion record is edited and an electronic disclosure sent to SOCA. **Only authorised users can create and send electronic referrals direct to SOCA.**

Legal Process Records

Business Units that usually submit legal process information (production orders or disclosure authorities etc) to Group Financial Crime should continue to do so, for inclusion on the GK3 database.

Legal Process Category

Select the relevant legal process category from the drop down menu. Only one can be selected.

Source

Select the relevant source from the drop down menu.

Legislation

Select the relevant legislation from the available list.

Enquiry From

Free text field in which to record who the enquiry is from – e.g. Metropolitan Police Fraud Squad.

Contact Name

Free text field in which to record name details.

Contact Number

Free text field in which to record contact details.

Comment

Free text field for any comments – e.g. restrictions to Customer Disclosure Authorities.

External Data Record

Information Source

Select the relevant external source from the drop down menu. Only one can be selected.

Referral Records (Please note this case type has not been recently used)

Result of Referral

Users must select an option from the drop-down menu.

Options to select are:

- Accept/Leave in Branch hands
- Decline Fraud
- Decline Suspect

- No Referral
- Pending

Reason for Referral

Select the relevant reason from the drop-down menu. Only one can be selected.

Sanctions & Terrorist Financing Record (This should be completed by Group Risk Management)

GRM List Reference

Enter List Reference.

Source

Select the relevant source from the drop down menu. Only one can be selected.

Issue for Periodic Searching

Select YES or NO to allow periodic searching.

GRM Control No.

Enter Control Number

Click Create to move to the Case Notes Screen

Case Notes

Free text field for additional notes or updates. A spellcheck function is now available.

Summary/Assessment

Free text field for a summary and assessment of the incident where appropriate. Additional reasons for suspicion can be included in this field. Spellcheck is available.

Conclusion:

Pre drafted conclusions are available for selection, however if none are appropriate please select other and enter a free text conclusion. Spellcheck is available for the free format text input.

Click on "Save" and then click on "Summary" to input subject data.

Linked Cases (back)

The system will run an overnight process that will link data based on certain business rules (see below). It is recommended that any linking be left to the automated process unless there is a more specific reason for linking cases.

Automated Linking is based on the following criteria:

| Data Block | Fields matched for Linking | Linked Cases Display |
|---------------|----------------------------------|----------------------|
| Personal Data | Surname + DOB | Personal Data (auto) |
| | Customer Identification No (CIN) | |
| | National Insurance No. | |
| | Passport No. | |
| | Driving Licence No. | |
| Business Data | Business / Organisation Name | |

| | | |
|--------------|-------------------------------------|--------------------------|
| | Company Reference No. | Business/Org Name (auto) |
| Address Data | House Number + Postcode | Address (auto) |
| | House/Bldg Name + Postcode | |
| | House No, Street Name + Town | |
| | House/Bldg Name, Street Name + Town | |
| Account Data | Account Number + Sortcode | Account (auto) |
| Phone Data | Phone Number (last 6 numbers) | Phone (auto) |
| Misc. Data | E-Mail, Website and IP Address | Misc (auto) |

If there are a number of matchable options between cases, and then the above order is adopted, i.e. Personal will come before Address.
Links cannot be automatically de-linked, as this must be handled manually - see below.

Manual Linking

The purpose of linking is to match Case Files together to provide a more comprehensive view of how wide is the extent of any untoward activity.
Whilst the Auto-Linking process is the recommended option, there will be occasions when the reason for linking is different, i.e. Suspect Fraud Ring.

To manually link a case click on the "Maintain Links" button, to display the pop-up screen.

Enter the Case Number(s) you wish to add or click the radio button next to the Case Number you wish to delete.

To add a link, select a reason for link from the drop-down listing.

Please note that a valid link can only be created after a validation check has taken place - this will confirm that Case Number exists.

A warning message will display when a valid link cannot be created.

Click on the Submit button to create or delete the link(s).

Entering Subject Data

Details of suspects and/or innocent third parties and other connected data can be entered at this stage.

Click on the "Subject Data" tab.

Enter details (if relevant) for:

- Personal
- Business
- Telephone
- Address
- Account
- Miscellaneous

Click on the Add button to open the data entry box and add the relevant data and use the further Add button to save data. The Cancel button will close the data entry box, whilst clicking on the Clear button will clear all the data.

After clicking on the Add button the data is saved and confirmed by the pop-up box.

Clicking on the OK button will clear the contents and enable new data to be added.

Each piece of data **must be risk rated** as this will affect whether the data becomes searchable to Standard users.

Data in both the Personal Data and Business data blocks must enter a Key Information Type (KIT).

A KIT is typically a "first-view" identifier of the role the individual or Business has in the case itself - this is also now available in the Complex User search results.

Every case that is created ideally should have a "Main Party" KIT and then other individuals will be associated, such as "Spouse", "Partner" etc.

Future system enhancements will extend the KIT use to the other data blocks and thereby provide a total "first-view" and the individual or Business.

In the meantime, KITs can be used in other fields within the Telephone Data block (Telephone Owner) and such like to demonstrate the association of data more readily.

Verify Address Button - Address Data Block

This button can be used to compare the data entered onto GK3 against UK address data held on QAS address file. It enables users to verify that the full address entered on GK3 is in fact the correct UK postal address. This cannot be used to verify overseas addresses.

Please note that tabbing onto this button and pressing Enter, the data is saved rather than the Address verification box being invoked.

There are no limits to the number of personal names, company/business names, addresses, telephone numbers or accounts that can be added to a Case record. It is important that information is entered in the correct fields and risk rated correctly, as this will affect the searching capabilities of the database.

Attachments:

Attachments can be added to a Case record, which can then be viewed by other users, when reading a case file. The attachment can be a word document, an excel spreadsheet, a page saved from the Internet or a scanned image.

Please remember that items attached to a case should be relevant and not contain comment that maybe construed as unfairly detrimental, thereby causing the potential for losing legal privilege.

If unsure on the point and what document can be attached, please refer to Group Financial Crime.

Title

Add the relevant document/attachment name for reference purposes.

Author

Enter name details.

File Name

Click on browse and then double click on the file to be attached from the relevant drive/directory on your PC/network. Once the correct file is selected in the 'file name' field, click on the ADD button.

Editing a Case Record (back)

Once you have accessed a record by clicking on the reference number from either the search results or your "Last Cases Viewed" (Complex User Homepage), you can edit the record by navigating to the part of the case you wish to edit.

Typically, the data most likely to be edited will be personal data and case notes.

Personal Data

Click on the Personal Data tab in the Case File Summary and locate the data block you wish to edit, i.e. Personal, Address or Phone. Click on the Edit button to the right of the data block.

Amend/Edit data as required and then click on "Save".

Case Notes

Click on the "Notes" button in the Navigation Footer or click on the Add button in the Case Notes data block to access the Case Notes view.

Enter required text in the large text box and click on the Save button.

Click on the View History (the number in the brackets denotes the number of entries) for copying text and using the Edit menu and select Paste to enter the content and further edit before using the Save button.

Case Notes can be deleted by Authorised Complex users - please note this is an auditable action.

Attachments

Click on the Edit button alongside the attachment you wish to edit or delete.

IMPORTANT NOTE

When accessing a Case Record there may be occasions when mandatory data is required to allow editing actions to be done, typically this might be the "Query Contact" field. If this is encountered, select your name from the drop-down list to continue.

Creating an SOCA Disclosure (back)

Clicking on the SOCA button on the top right-hand side of the Case Summary will open the SOCA disclosure creation template.

Where there is more than one piece of key information (individual names or companies) on the Case record, you will be prompted to select the Main Subject of the disclosure and all other associated parties.

| Persons associated with Case File | | | | | | |
|-----------------------------------|--------------------------|---------|------------|------------|---------------|---------------|
| Main | Include | Surname | Forename 1 | Forename 2 | Key Info Type | Date of Birth |
| <input type="radio"/> | <input type="checkbox"/> | HUGHES | UNKNOWN | | Unknown | 21 Apr 1950 |

| Companies associated with Case File | | | | | |
|-------------------------------------|--------------------------|--------------------|------------------|---------------|--------------------|
| Main | Include | Company name | Company Ref. No. | Key Info Type | Legal Jurisdiction |
| <input type="radio"/> | <input type="checkbox"/> | PARK CAKE BAKERIES | | Employer | Unknown |

Back Next

Core SOCA Details

Main Subject / Include

Select 1 main subject using the selection under Main and indicate any associated parties for inclusion on the disclosure by clicking in the boxes under Include. Select OK.

Disclosure Type

Select the relevant reason (crime, drugs or terrorism) for disclosure from the drop down menu.

Disclosure Date

This will automatically default to the current date.

Branch/Outlet

Fill in the relevant source branch / department / business.

Branch Code

Fill in the relevant sort code if applicable – if a sort code has been added to the Case Base record this will automatically transfer to this field. This is a mandatory field and disclosures will fail where there is no sort code entered.

Source Reference

The record reference number will automatically be entered into this field.

Trust Indicator

Select either yes or no to indicate whether there are constructive trust issues.

Further Information

This field defaults to No. Select yes from the drop down menu if the disclosure is an update to an existing disclosure.

Submitting Branch Address

Fill in address details if applicable.

Text

This is a free text field. Where information has been added to the summary and assessment field the text can be transferred to the text field and amended if necessary. To select information from any of the summary and assessment field click on add summary and assessment. This text can be amended if necessary. Additional text can be added to this field direct. Text should be kept coSOCAe and contain details of suspicions.

The screenshot shows a web-based form titled "NCIS Disclosure (Draft)". At the top right, there is a "User Options" dropdown and a "CASE: 3696285" label. The form contains several input fields: "Disclosure Type" (a dropdown menu), "Submitting Branch Address" (a text field), "Disclosure Date" (set to 02 Nov 2004), "Branch / Outlet" (a text field), "Branch Code" (a text field), "Trust Indicator" (a dropdown menu set to No), "Further Information" (a dropdown menu set to No), and a large "Text" area. Below these fields are two buttons: "Add Case Notes..." and "Add Summary and Assessment...". To the right of these buttons are two lines of text: "REASON FOR PREVENTION : ...etc." and "This record has been...etc.". Below the form is a section titled "Associated Data" which lists two entries: "(Main Subject) UNKNOWN HUGHES 21 Apr 1950" and "PARK CAKE BAKERIES Unknown". Each entry has a small icon to its left and a set of icons to its right. At the bottom of the form are three buttons: "Cancel", "Back", and "Delete".

Associated Data

This section outlines key information details associated with the disclosure. The main subject will appear at the top of this section in bold. All other subjects will appear listed below the main subject. Address, other information and transaction data can be added for each subject on the disclosure.

Subject Data

Additional data, such as occupation/employer, company type, vat number & association to the main subject, which is not contained on the Case record can be entered for the subjects of the disclosure.

Click on the subject icon (next to the subject name). This will call up an information box that can then be filled in with any available additional details. Once all details have been filled in, click on OK.

Address Data

To add an address to the disclosure, click on the house icon next to the relevant subject name. If addresses have already added to the Case record you will be able to select the relevant address from a list by clicking over the relevant underlined address, and the address fields on the disclosure will be automatically filled-in with these details.

Select the address type and indicate if the address is current on the drop down menus.

Information

To add identification information to the record, click on the i icon next to the relevant subject name. Select the information type from the drop down menu and add data to the descriptor field (this field is compulsory). Additional info can be added to the free text description field.

Transactions

To add transactions to the disclosure click on the money icon to the right of the main subject name. It is only possible to enter transactions in connection with the main subject name. The disclosure will fail if transactions are added to associated data subjects or companies. If account and transaction data has already been added to the Case record you will be able to select the details by clicking over the relevant underlined account/transactions and the data available will be transferred to the disclosure.

Associated Data Subjects

To add subjects to the record select either add person or add company and complete the details manually.

Delete Data Subjects

To delete a piece of information from the associated data subject fields, click on the red X next to the relevant piece of data.

Next Steps

Save Disclosure

To save a completed disclosure, simply select the Save button in the menu bar.

Delete Disclosure

To delete a disclosure prior to approval, select the delete button in the navigation menu bar at the bottom of the screen.

Authorisation

Disclosures are saved in draft form prior to being sent to SOCA. All disclosures must be reviewed and sent onto SOCA electronically by a user with authorisation to forward these reports. Click on the "Submit for Approval" button to forward for checking.

Printing

Should it be necessary to print the entire record, click on the Print icon, which then displays the completed fields in a format suitable for printing. Click on the Print Button to print to your default printer.

Status

- **Draft** - Disclosure is in draft form waiting to be submitted by an authorised GK user.
- **Approved** - Disclosure has been submitted and is waiting to be forwarded to SOCA via e-mail.

- **Submitted** - Disclosure has been e-mailed, however confirmation of receipt has not yet been received. GK3 automatically sends files to SOCA on a daily basis at 10-00 and 15-00. Please note there is no manual override.
- **Received** - Receipt received from SOCA – disclosure successfully submitted electronically.

Receipts

SOCA will send back an electronic receipt when they have received a disclosure electronically. This receipt will be attached to the relevant Casefile, as disclosure id.

Remember - you can now search against an SOCA Disclosure ID.

****Please also note that most data is uneditable in the SOCA template and users will need to return to the Case Summary, to make the necessary changes and then re-create the disclosure****

New User Set-Up Process (back)

Please refer to ~ GK3 Admin for instructions

=====End of Document=====